# Coan River Watershed Total Maximum Daily Load (TMDL) Report for Six Shellfish Areas Listed Due to Bacteria Contamination



Virginia Department of Environmental Quality

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### **Fecal Coliform Impairment**

Nine areas of the Coan River, a rural 14,951acre, tidal watershed located in Northumberland County, Virginia were placed on the Commonwealth of Virginia's 1998 Section 303(d) List of Impaired Waters because of violations of the fecal coliform bacteria water quality standard for shellfish waters. Of these nine areas, all of which are tributary to the Potomac River, three were dropped from the impaired waters list because they no longer violated the water quality standard and a Total Maximum Daily Load (TMDL) allocation was no longer considered necessary. The remaining segments listed are referenced in this document by the growing area number, shellfish area condemnation number and downstream most water quality station number (e.g. 8-16-145). These TMDLs focus on fecal coliform impairments that are the organism of concern identified in the water quality standard. Based upon exceedances of this standard recorded at Virginia Department of Health, Division of Shellfish Sanitation (VDH-DSS) monitoring stations, these segments of this estuary do not support the harvest for consumption of shellfish indigenous to these waters. Shellfish may be harvested by permit for transport to unimpaired waters cleanse themselves prior to harvest for consumption

The applicable state standard specifies that the number of fecal coliform bacteria shall not exceed a maximum allowable level of q geometric mean of 14 most probable number (MPN) per 100 milliliters (ml) or a 90<sup>th</sup> percentile geometric mean value of 49 MPN/100ml, whichever is more stringent (Virginia Water Quality Standard 9-VAC 25-260-5). In TMDL development, the 90<sup>th</sup> percentile 14 MPN/100 ml was used, since it represented the more stringent standard.

### **Sources of Fecal Coliform**

Potential sources of fecal coliform include primarily non-point source contributions, as there are no permitted point source discharges in the watershed. Non-point sources include wildlife; grazing livestock; land application of bio-solids; recreation vessel discharges; failed, malfunctioning, and non-operational septic systems, and uncontrolled discharges (straight pipes conveying gray water from kitchen and laundry areas of private homes, etc.).

### **Water Quality Modeling**

Because the volume of the individual condemned segments and overall watershed were small, land use pattern not complex, and the absence of large point sources a simplified volumetric modeling approach was utilized. This approach has received the approval of the U.S. Environmental protection Agency for use in such non-complex tidal watersheds. In establishing the existing and allocation conditions, seasonal variations in hydrology, climatic conditions, and source contributions were evaluated prior to selecting the simplified model.

### **Determination of Existing Loadings**

To assist in partitioning the loads from the diverse sources within the watershed water quality samples of fecal coliforms were collected for one year and evaluated using an antibiotic resistance analysis in a process called bacterial source tracking. These samples were compared to a reference library of fecal samples from known sources. The resulting data was used to assign portions of the load with in the watershed to wildlife, birds, humans, pets or livestock. The results of this analysis indicated that fecal coliforms of probable human origin were the dominant source in the watershed and that birds and wildlife were secondary contributors that may dominate in some months. This bacterial source tracking (BST) eliminates the need for developing inventories of livestock populations, and utilization of highly subjective wildlife, bird and pet population estimates. The presence of a large signature attributable to one component is sufficient to establish potential directions for remediation under a future implementation plan.

### **Load Allocation Scenarios**

The next step in the TMDL process was to utilize to determine the appropriate the water quality standard to be applied. This was set as the 90<sup>th</sup> percentile standard because the data established that the segments were meeting the geometric mean standard. Calculated results of the model for each segment was used to establish the existing load in the system. The load necessary to meet water quality standards was calculated in a similar fashion using the water quality standard criterion in place of the ambient water quality value. The difference between these two numbers represents the necessary level of reduction in each segment.

Finally the results of the BST developed for each segment was used to partition the load allocation that would meet water quality standards according to source. The results of the model, the BST source partitioning and the reductions necessary for each segment are shown below and on the following page.

### **REDUCTION BASED UPON 90TH PERCENTILE STANDARD**

AREA 145-D	REA 145-D BST Result Actua		Load Allocation	Reduction needed
STATION 8-20	% of total load		(cfu)*	
Total	100%	2.78E+11	1.31E+11	53%
Bird	23%	2.08E+10	2.08E+10	0%
Wildlife	5%	4.95E+09	4.95E+09	0%
Human	57%	5.15E+10	1.79E+10	65%
Pets	4%	3.96E+09	3.96E+09	0%
Livestock	11%	9.90E+09	9.90E+09	0%

### REDUCTION BASED UPON 90TH PERCENTILE STANDARD CONTINUED

AREA 145-E STATION 8-24	BST Result % of total load	Actual Load (cfu)*	Load Allocation (cfu)*	Reduction needed
Total	100%	6.91E+10	6.02E+10	12.93%
Bird	28%	1.93E+10	1.93E+10	0.00%
Wildlife	7%	4.84E+09	4.84E+09	0.00%
Human	51%	3.52E+10	2.64E+10	25.20%
Pets	9%	6.22E+09	6.22E+09	0.00%
Livestock	5%	3.46E+09	3.46E+09	0.00%

AREA 145-F	A 145-F BST Result Actual Load (cfu)*		Load Allocation	Reduction needed
STATION 8-27	% of total load		(cfu)*	
Total	100%	9.90E+10	5.75E+10	42%
Bird	23%	2.08E+10	2.08E+10	0%
Wildlife	5%	4.95E+09	4.95E+09	0%
Human	57%	5.15E+10	1.79E+10	65%
Pets	4%	3.96E+09	3.96E+09	0%
Livestock	11%	9.90E+09	9.90E+09	0%

AREA 145-G STATION 8-33	BST Result % of total load	Actual Load (cfu)*	Load Allocation (cfu)*	Reduction needed
Total	100%	2.21E+09	1.94E+09	12%
Bird	14%	3.09E+08	3.09E+08	0%
Wildlife	8%	1.77E+08	1.77E+08	0%
Human	64%	1.41E+09	1.15E+09	19%
Pets	2%	4.42E+07	4.42E+07	0%
Livestock	12%	2.65E+08	2.65E+08	0%

AREA 145-H STATION 8-37_5Z	BST Result % of total load	Actual Load (cfu)*	Load Allocation (cfu)*	Reduction needed
Total	100%	6.36E+10	2.11E+10	67%
Bird	19%	1.21E+10	1.21E+10	0%
Wildlife	11%	7.00E+09	7.00E+09	0%
Human	58%	3.69E+10	3.69E+07	100%
Pets	1%	6.36E+08	6.36E+08	0%
Livestock	11%	7.00E+09	1.33E+09	81%

AREA 145-I STATION 8-38	BST Result % of total load	Actual Load (cfu)*	Load Allocation (cfu)*	Reduction needed
Total	100%	7.56E+11	5.45E+11	28%
Bird	17%	1.29E+11	1.29E+11	0%
Wildlife	9%	6.80E+10	6.80E+10	0%
Human	63%	4.76E+11	2.64E+11	45%
Pets	5%	3.78E+10	3.78E+10	0%
Livestock	6%	4.54E+10	4.54E+10	0%

### **Margin of Safety**

In order to account for uncertainty in modeled output, a margin of safety (MOS) was incorporated into the TMDL development process by making very conservative choices. A margin of safety can be incorporated implicitly in the model through the use of conservative estimates of model parameters, or explicitly as an additional load reduction requirement. Individual errors in model inputs, such as data used for developing model parameters or data used for calibration, may affect the load allocations in a positive or a negative way. The purpose of the MOS is to avoid an overall bias toward load allocations that are too large for meeting the water quality target. An implicit MOS was used in the development of this TMDL through selection of a high protective level of water quality standard, utilization of entire segment volumes for model calculations, averaging extreme high and low values to ensure that the more protective condition with the largest available data set was addressed and emphasizing watershed based implementation measures.

### **Recommendations for TMDL Implementation**

The goal of this TMDL was to develop an allocation plan that can be met during the implementation phase. Virginia's 1997 Water Quality Monitoring, Information and Restoration Act states in section 62.1-44.19.7 that the "Board shall develop and implement a plan to achieve fully supporting status for impaired waters".

The TMDL developed for the Coan River impairments provides allocation scenarios that will be a starting point for developing implementation strategies. Modeling shows that meeting the average water quality condition in this tidal water body will ensure that water quality standards are met. The model shows that elimination of the human fecal component alone is sufficient to ensure that water quality standards will be well within the acceptable standard.

Additional monitoring aimed at targeting these reductions is critical to implementation development. Bacterial source tracking to identify more localized sources of contamination and an improved understanding of the episodic, or potentially seasonal bird driven impairment area will contribute greatly to the implementation effort. Once established, continued monitoring will aid in tracking success toward meeting water quality milestones.

Also critical to the implementation process is public participation. Non-point loading to the system is the critical factor in addressing the problem. These sources cannot be addressed without public understanding of and support for the implementation process. Stakeholder input will be critical from the onset of the implementation process in order to develop an implementation plan that will be truly effective.

### **Public Participation**

During development of the TMDL for the Coan River, public involvement was encouraged through three meetings. Two stakeholder meetings and a formal public meeting were held over the course of 2 years.

A basic description of the TMDL process and the agencies involved was presented at the first stakeholder meeting and again at the public meeting. The second stakeholder meeting was held to discuss the source assessment input, bacterial source tracking, and model results. The final model simulations and the TMDL load allocations were presented during the public meeting. Public understanding of and involvement in the TMDL process was encouraged. Input from these meetings was utilized in the development of the TMDL and improved confidence in the allocation scenarios and TMDL process.

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### 1.0 Introduction

This document details the development of bacteria TMDLs for 6 segments of the Coan River in Northumberland County, Virginia which are listed as impaired on Virginia's 303(d) Total Maximum Daily Load Priority List. The TMDL is one step in a multi-step process that include a very high level of public participation in order to facilitate the correction of water quality issues which can affect public health and the health of aquatic life.

### 1.1 Listing of Water Bodies Under the Clean Water Act

Section 303(d) of the Clean Water Act and EPA's Water Quality Planning and Management Regulations (40 CFR Part 130) require states to develop Total Maximum Daily Loads (TMDLs) for water bodies which are exceeding water quality standards. TMDLs represent the total pollutant loading that a water body can receive without violating water quality standards. Water quality standards are numeric or narrative limits on pollutants that are developed to ensure the protection of human health and of aquatic life. The TMDL process establishes the allowable loading of pollutants for a water body based on the relationship between pollution sources and in-stream water quality conditions. By following the TMDL process, states can establish water quality based controls to reduce pollution from both point and non-point sources to restore and maintain the quality of their water resources (EPA, 1991).

Waters that are determined to be impaired can be free-flowing streams, lakes and tidal waters, anywhere in Virginia. Bacteria violations are the most common cause for the impairments. In Virginia, we have identified a need to develop 644 TMDLs by 2010. Of these approximately 230+ are shellfish water closures due to an excessive levels of fecal coliform bacteria. Among these shellfish areas, several areas within the Coan River have been regulated under Virginia Department of Health, Division of Shellfish Sanitation (VDH-DSS) notice number 145 as restricted harvest areas because the water quality data showed excessive levels of bacteria in these waters. The waters were classified as impaired on the state's 303(d) list of impaired waters and require a TMDL. This report addresses only segments which were identified on the 1998 303(d) list and does not include segments which may subsequently have been placed on the more recent listing. Those waters will be addressed in future TMDL's for this water body.

### 1.2 Overview of the TMDL Development Process

The TMDL study for these waters is the first part of a three-step process aimed at restoring water quality. This study is designed to determine how much pollutant input needs to be reduced in order to achieve water quality standards. The second step in the process is the development of an implementation plan that identifies which specific control measures are necessary to achieve those reductions, their timing for implementation and at what cost.

The implementation plan will also outline potential funding sources. The third step will be the actual implementation process. Implementation will typically occur in stages that allow a review of progress in reducing pollutant input and to make any identified changes to pollutant control measures.

Agencies of the Commonwealth, including the Department of Environmental Quality (DEQ), the VDH-DSS and the Department of Conservation and Recreation (DCR) have worked together with state universities, the U.S. Geological Survey and the U.S. Environmental Protection Agency to develop an appropriate methodology for TMDLs in impaired shellfish waters. This method utilizes bacteria source tracking (BST) to determine the most probable sources of fecal coliform in the water. It has been shown that BST can provide information to assist in the identification and targeting of sources of bacterial pollution. In addition to the BST, the TMDL will be developed using VDH-DSS monthly monitoring and sanitary shoreline surveys. The results for this technology as applied to the Coan River is described in section 5.0. Finally, to assist with the analysis and development of the TMDLs for these rivers and other impaired water bodies in Northumberland County, the Department of Environmental Quality has contracted with the Virginia Institute of Marine Science for further technical assistance.

The TMDL development process also must account for seasonal and annual variations in precipitation, flow, land-use, and pollutant contributions to the extent available data will permit. Such an approach helps to ensure that TMDLs, when implemented, do not result in violations under a wide variety of scenarios that affect bacteria loading and meet the requirements of a TMDL.

### 1.3 Classification of Virginia's Shellfish Growing Areas

The Virginia Department of Health, Division of Shellfish Sanitation (DSS) is responsible for classifying and ensuring the health for human consumption of Virginia's shellfish resources. The VDH-DSS collects monthly samples at over 2,000 stations in the shellfish growing areas of Virginia. They determine if the data show that the water quality standard is met on an annual basis, though more frequent consideration is possible. If the water quality standards are not met, the shellfish area is closed for the harvest of shellfish that go directly to market. These areas that exceed the water quality standard and are closed for the direct marketing of shellfish are eligible for harvest of shellfish under permit from the Virginia Marine Resources Commission and VDH-DSS. The permit establishes controls that in part require shellfish be allowed to depurate for 15 days in clean growing areas or specially designed licensed on-shore facilities. DSS follows the requirements of the National Shellfish Sanitation Program (NSSP), which is regulated by the U.S. Food and Drug Administration. The NSSP classification specifies the use of a shoreline survey completed by DSS as its primary tool for classifying shellfish growing waters. Fecal coliform concentrations in water samples collected in the immediate vicinity of the shellfish beds function to verify the findings of the shoreline survey, and to define the border between approved and condemned (unapproved) waters.

DSS develops the shoreline survey to locate as many sources of pollution as possible within the watersheds of shellfish growing areas. This is accomplished through a property-by-property inspection of the onsite sanitary waste disposal facilities of most properties on un-sewered sections of watersheds, and investigations other sources of pollution such as wastewater treatment plants (WTP), marinas, livestock operations, landfills, etc.

The information is compiled into a written report with a map showing the location of the sources of real or potential pollution found. DSS sends it to the various state agencies that are responsible for regulating these concerns, as well as the responsible local government. Once an onsite problem is identified the local health departments (LHDs), or other state or local agencies may play a major role in the process by obtaining correction of the onsite sanitary waste disposal problems. Most of the DSS effort is focused on locating fecal contamination, and in this manner facilitating the prevention of significant amounts of human pathogens from getting into shellfish waters. In addition to the shoreline survey, the NSSP requires that DSS collect seawater samples in the growing areas as part of the classification procedure. States must use the most recent 30 samples, collected randomly with respect to weather (scheduled one month in advance), to classify a station. The standard for fecal coliforms in waters for direct shellfish harvest to market is a geometric mean no greater than 14 Most Probable Number, abbreviated MPN, fecal coliforms/100 ml and/or an estimated 90<sup>th</sup> percentile no greater than 49 MPN/100ml. Exceeding either number requires closure of that station. In Virginia, it is believed that most of the high fecal coliform counts are due either to runoff originating from human development, agriculture and livestock operations, or from wildlife.

### 2.0 Applicable Water Quality Standard

According to Virginia Water Quality Standards (9 VAC 25-260-5), the term "water quality standards means provisions of state or federal law which consist of a designated use or uses for the waters of the Commonwealth and water quality criteria for such waters based upon such uses. Water quality standards are to protect the public health or welfare, enhance the quality of water and serve the purposes of the State Water Control Law (§62.1-44.2 et seq. of the Code of Virginia) and the federal Clean Water Act (33 USC §1251 et seq.)."

As stated above, Virginia water quality standards consist of a designated use or uses and a water quality criteria.

### 2.1 Designated Uses

According to Virginia Water Quality Standards (9 VAC 25-260-10A), "all state waters are designated for the following uses: recreational uses (e.g., swimming and boating); the propagation and growth of a balanced indigenous population of aquatic life, including game fish, which might be reasonably expected to inhabit them; wildlife; and the production of edible and marketable natural resources (e.g., fish and shellfish)."

### 2.2 Applicable Water Quality Criteria

For a shellfish supporting water body to be in compliance with Virginia bacteria standards for primary contact recreational use, VADEQ specifies the following criteria (9 VAC 25-260-160): "In all open ocean or estuarine waters capable of propagating shellfish or in specific areas where public or leased private shellfish beds are present, and including those waters on which condemnation or restriction classifications are established by the State Department of Health the following criteria for fecal coliform bacteria shall apply; The geometric mean fecal coliform value for a sampling station shall not exceed an MPN (most probable number) of 14 per 100 milliliters. The 90<sup>th</sup> percentile shall not exceed an MPN of 43 for a 5 tube, 3 dilution test or

49 for a 3 tube. 3 dilution test"

### 3.0 Watershed and Water Quality Characterization

The Coan River estuary 's water quality problems are the result of the interactions between the existing physical environment and anthropogenically-induced alterations to the watershed. The examination of these characteristics is critical to understanding the potential resolution of these impairments.

### 3.1 Physical Environment

The Coan River watershed is located entirely within and along the northwestern corner of Northumberland County in Virginia's Coastal Plain Physiographic Province and the Coastal Lowland sub-province. The Coastal Lowland sub-province is characterized by flat, low relief regions along the major rivers and Chesapeake Bay. Elevations range from 0' to 60' above mean sea level. The Virginia Coastal plain is underlain by deep tertiary and cretaceous formations of marine and deltaic sands and clay, overlain by Yorktown and Eastover formations of marine sand and clay, this is topped by quaternary formations that are comprised of silts, sands and clays of principally fluvial and estuarine origin. The foregoing layers rest atop the igneous and metamorphic rock base formation. The Coan River watershed drains north to the Potomac River and is subject to the ebb and flow of the tide. The Coan River flows north from its headwaters bordering SR 600 to the south and SR 687. It enters the Potomac River approximately 14 miles due west of the mouth. A topographic map of the Coan River Watershed is shown in Figure 3-1, soil drainage classification is shown in Figure 3-2.

The drainage area of the Coan River watershed is approximately 14,951 acres (23.36 mi<sup>2</sup>). The nearest climate station with a contiguous record that includes the water quality monitoring period for this report is located in Warsaw Virginia approximately 12 miles ESE of the study area. The average annual rainfall as recorded at Warsaw, Virginia is 42.94 inches. Table 2 presented below provides a summary of climate data for the Warsaw, Virginia weather station (SRCC 2002).

Table 3-1. Climate Summary for Warsaw, Virginia (448894)													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Average Max. Temperature (F)	46.4	49.8	58.3	69.3	77.5	85.0	88.7	86.9	81.1	70.6	60.1	49.7	68.6
Average Min. Temperature (F)	27.3	29.3	35.9	44.7	53.9	62.3	66.9	65.3	58.7	47.3	38.7	30.7	46.8
Average Total Precipitation (in.)	3.22	2.84	3.83	2.97	4.04	3.52	4.53	4.29	4.07	3.33	3.18	3.11	42.94
Average Total Snow Fall(in.)		5.0	2.4	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.5	2.6	16.3

<sup>\*</sup> Source: Southeast Regional Climate Center, <a href="mailto:sercc@dnr.state.sc.us">sercc@dnr.state.sc.us</a>

Figure 3-1 Location Map for the Coan River Watershed

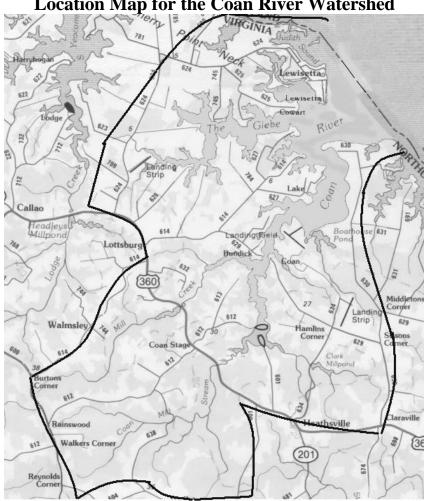


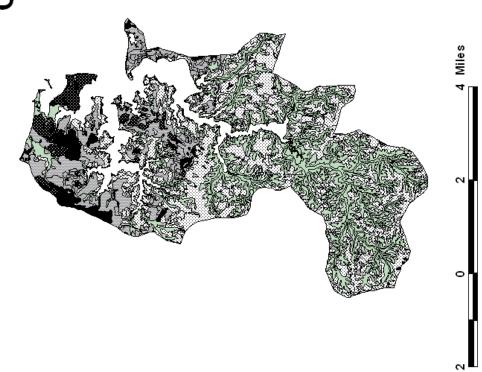
Figure 3-2

EXCESSIVELY WELL DRAINED MODERATELY WELL DRAINED

SOIL DRAINAGE CLASSIFICATION

# Coan River Watershed Soil Drainage Class





Land use in the Coan River watershed can be characterized as rural. The watershed contains considerable forestation and agriculture. Undeveloped land comprises more than 55% of the total watershed as forest and wetland, or water, with an additional 41% as agricultural land. Less than 3% of the Coan River watershed is characterized as developed. Land use area by category is shown in Table 3-2 and Figure 3-3.

Table 3-2. Land use in the Coan River watershed

Land Use Category	Area (acres)	Area (%)
Transitional	210	1.4
Forest	7,309	48.9
Wetland	581	3.8
Agricultural land (Row Crops,Pasture,Hay)	6,194	41.4
Commercial/Industrial/Transportation	71	0.5
Residential	143	1.0
Open Water	443	3.0
Open Water	443	3.0
Total	14,951	100

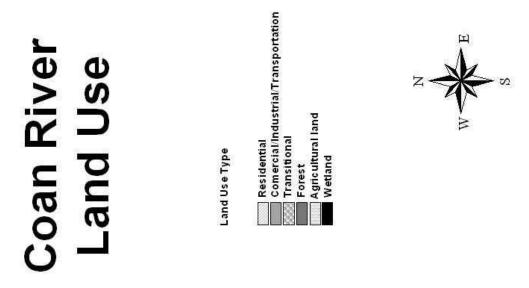
Source: Virginia National Land Cover Data (NLCD) Version 05-27-99

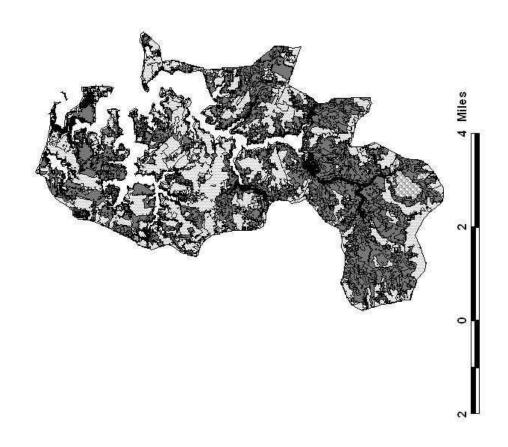
### 3.2 Water Quality Impairment by Condemnation Area

Several sections of the Coan River were listed as impaired on Virginia's 1998 303(d) Total Maximum Daily Load Priority List and Report (VADEQ, 1998) due to violations of the State's water quality standard for fecal coliform bacteria in shellfish supporting waters. The Department of Health, Division of Shellfish Sanitation, Notice and Description of Shellfish Condemnation Number 145, Coan River and the Glebe, lists and describes nine condemnation areas in the Coan River and its tributaries. This list was amended in 2002 to remove two of the three areas in the Glebe segment, as well as the segment at the headwaters of Kingscoate Creek that have been open since February of 1998 because the data showed them to be in compliance. The remaining six segments remain on the impaired waters list as of the date of this report and are shown in Table 3-3.

The Coan River water quality monitoring network consists of 36 water quality monitoring stations. These stations are monitored by the DSS once a month for fecal bacteria and the status of the closure areas are re-evaluated at a minimum annually. The network of water quality monitoring stations for the Coan River estuary is shown in Figure 3-4. Nine of the 36 stations represent the downstream limits of the shellfish closure areas due to bacteria. Table 3-3 shows the ambient bacteria concentrations for the 30 month period preceding

Figure 3-3





August of 2002. Of the original nine closure areas, three have been removed from consideration due to improved bacterial concentrations. These nine stations were also selected for a special TMDL study to facilitate the development of TMDLs for these segments. This TMDL study examined bacterial sources using the antibiotic resistance method (ARA) at these stations on a monthly basis from September of 2001 through August of 2002. A summary of water quality for the 30 months preceding the TMDL study and data is shown in Table 3-3.

Figure 3-4

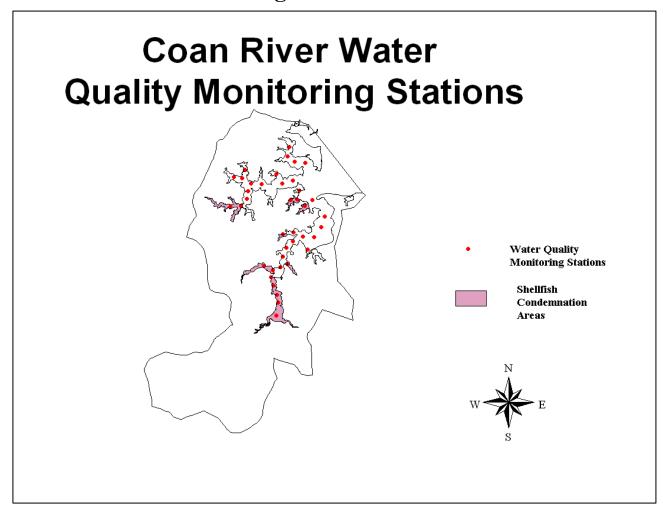


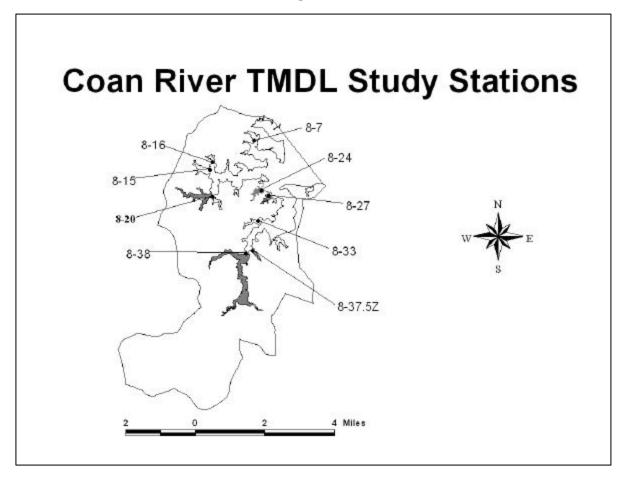
Table 3-3 Coan River Estuary Bacterial Water Quality Data Summary Feb.2000 to Aug. 2002.

Growing Area-Station noclosure no.	90 <sup>th</sup> Percentile Preceding 30 Months	Water Quality Standard	Station Meets Standard?	Geometric Mean Preceding 30 months	Geometric Mean Standard	Station Meets Standard ?	Current Condemn ation
8-7-145A*	40.5	49	Yes	9.0	14	Yes	No
8-15-145C*	38.4		Yes	8.2		Yes	No
8-16-145B*	74.7		No	13.1		Yes	No
8-20-145D	110.4		No	17.4		No	Yes
8-24-145E	56.3		No	10.9		Yes	Yes
8-27-145F	84.4		No	13.8		Yes	Yes
8-33-145G	55.8		No	11.2		Yes	Yes
8-37_5z-145H	147.6		No	24.8		No	Yes
8-38-145I	67.9		No	13.9		Yes	Yes

<sup>\*</sup> TMDL shellfish areas removed from the closure list as of 2002 because they were open in Feb. of 1998.

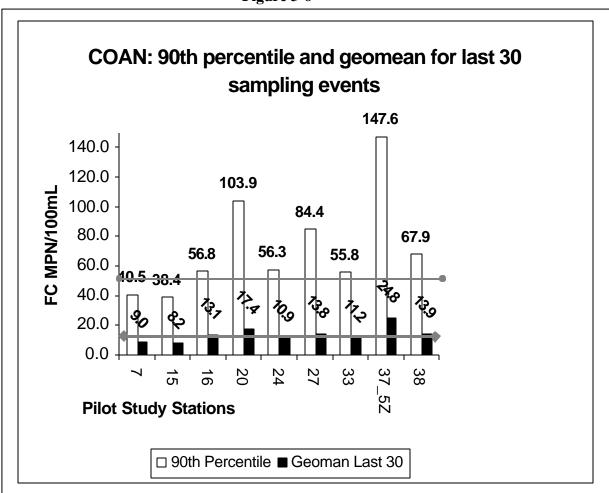
Figure 3-5 shows the location of the TMDL study stations and their adjacent condemnation areas. Of these stations, numbers 7,15 and 16 represent shellfish areas which were removed from the impaired waters list in 2002 as described in Section 2 and do not require TMDLs.

Figure 3-5



The data for the study areas for the last 30 monthly sampling events which covers the period from Feb. 2000 through August 2002 are graphically represented in Figure 3-6. These data show that all of the six stations representing the condemnation areas that are the subject of this TMDL report, do not meet the established 90<sup>th</sup> Percentile standard of 49 MPN/100ml, and two stations do not meet the geometric mean standard of 14 MPN/100ml. One station, station 24 representing the DSS closure area 145-E, Killneck Creek, initially appeared to meet both of the standards for the period of this report. Station 24 has been open twice and then closed three times since 1989 with the last closure occurring in November of 2002. Because the station does not qualify for de-listing in the 2004 305(b)/303(d) integrated report, the more recent 30 month data ending in November 2002 was used to calculate the reduction for this closure area. Overall temporal trends in the data for the period of record are shown in Figure 3-7 for each of the study stations. Stations, which consistently exceed the standard of 14 MPN per 100ml, are readily visible. Figure 3-7 illustrates that data from the preceding 30 months are representative of the Coan River system.

Figure 3-6



Stations 20 and 37\_5z had the highest peak values for fecal coliforms at the 90<sup>th</sup> percentile of 110 MPN/100ml and 147.6 MPN/100m respectively. Both stations also exceeded the geometric mean statndard of 14MPN/100ml as well. The data make it evident that the controlling condition for the bacterial levels is at the 90<sup>th</sup> percentile for all of the shellfish condemnation TMDLs in the Coan River watershed. It is expected that efforts undertaken to address this standard in the watershed would also ensure that the geometric mean standard is met.

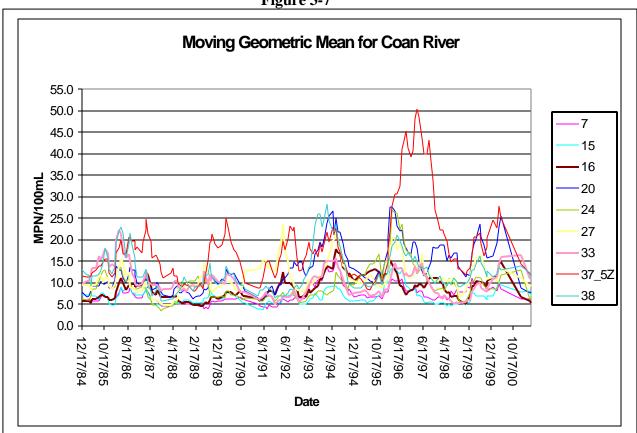


Figure 3-7

### 4.0 Assessment of Bacteria Sources

There are several methods that are utilized to determine the potential sources of bacteria to the system. Chief among these are:

- 1. VADEQ Point Source Inventory to determine permitted point sources such as sewage treatment plants;
- 2. DSS Shoreline Survey to determine principal non-point sources such as failing septic systems and farm based non-point source operations; and,
- 3. Bacterial source tracking to identify potential proportionate source loadings from humans, livestock, and wildlife.

All of these are utilized in this report.

### **4.1 Point Source Contributions**

There are no VPDES permitted point source contributions to the Coan River watershed.

### **4.2 Non-Point Source Contributions**

The shoreline survey is used as the primary source for non-point source contributions due to their detailed assessment of residences and businesses in the watershed. This is accomplished through direct observation of direct and indirect discharges to the watershed. Such discharges include storm water systems, failing septic systems, waste water treatment plants, livestock yards and pastures, as well as surface runoff from lawns and undeveloped landscapes. Figure 4-1 summarizes the results of the DSS sanitary shoreline survey dated February 1997 for the Coan River watershed. An edited copy of the textual portion of this survey is included as Appendix A. Edits were conducted solely to protect the privacy of individual landowners and businesses.

The survey identified 26 sanitary sewage deficiencies, 7 industrial waste, 1 solid waste dumpsite, 7 boating related sources, 2 sites with a potential for pollution and 3 animal waste sources.

There are many avenues of non-point source pollution into water-bodies. Some of these contributions such as those contributed by wildlife, both mammalian and avian, are natural conditions and may represent a background level of bacterial loading. Other contributions such as those contributed by mammalian livestock and avian livestock result from runoff from pastureland, concentrated animal feeding operations, or livestock yards. Pet contributions usually occur through street and land runoff into tributary streams. Non-Point source contributions to the bacterial levels in the Coan River from human activities generally arise from failing septic systems and associated drain fields, kitchen and laundry waste discharges, illegal straight pipes, moored or marina vessel discharges and in waters where sewer systems are present, exfiltration from sewer lines. In the Coan River watershed there is no municipal sewer system and therefore no combined outfalls or exfiltration sources. Homes in this watershed utilize septic systems and drain fields for waste treatment. Therefore these systems are suspected as potential sources of human bacteria loading due to failures in septic waste treatment systems, possibly augmented through potential pollution from recreational vessel discharges.

### **4.3 Bacterial Source Tracking**

Bacterial Source tracking is used to provide information regarding contributions from anthropogenic (i.e. human) as well as background sources, such as wildlife, for which no exact numbers exist. The nine stations that were selected as a TMDL study for this TMDL were also evaluated for source characterization through a process called Bacterial Source Tracking or, BST. Twelve months of sampling was conducted from September 2001 through August 2002 to obtain the necessary fecal coliform isolates. The TMDL study BST analysis uses the Antibiotic Resistance Approach (ARA), to determine the sources of fecal coliform to the waterbody. ARA uses fecal streptococcus or *Escherichia coli* (*E*.

Coli) and patterns of antibiotic resistance for separation of sources. The premise is that human, domestic animal, and wild animal fecal bacteria will have significantly different patterns of resistance to the battery of antibiotics used in this test. The ARA determines the percent loading per source category to the water. The five major source categories that were used in the TMDL study are human, pets, livestock, mammalian wildlife, and birds. Figure 3-5 shows the TMDL study stations, which are the BST monitoring stations for the Coan River. The full BST report for the Coan River is located in Appendix B. The data developed for the Coan river watershed show that the dominant contribution in virtually all of the closure areas is overwhelmingly human in origin on an annual average basis. Second to human, avian contributions, primarily from naturally occurring populations of waterfowl, as well as contributions by wildlife, are the largest components of the bacterial loading to the system. The monthly data by closure area is shown in the following pages both in graphical and tabular form.

Figure 4-1 Coan River Sanitary Survey Deficiencies Coan River Sanitary Survey Deficiencies

A CONTRIBUTES ANIMAL POLLUTION, indirect

CONTRIBUTES POLLUTION (kitchen or laundry wastes), direct

CONTRIBUTES POLLUTION (kitchen or laundry wastes), indirect CONTRIBUTES POLLUTION, indirect NO FACILITIES, indirect POTENTIAL POLLUTION POTENTIAL POLLUTION, indirect SOLID WASTE DUMPSITE, indirect Stormwat Coandef2 **Boating Activity** Coandef2 Industrial Waste Coan River Boundary current water WILLIAM MARY Kilometers Survey Date: 2-25-97

14

### a). VAP A34E, DSS Closure Area 145 D, Long Cove

As shown in Figure 4-2 and its associated table, the dominant contributing source to the bacterial levels of Long Cove is human in origin in all months of the study period except September and June. Birds and wildlife were predominant sources during these those months.

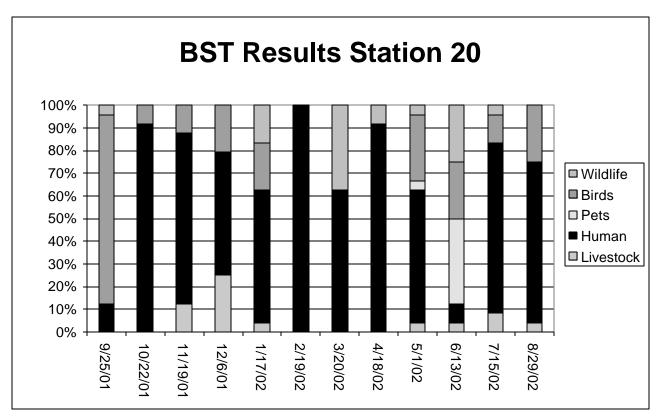
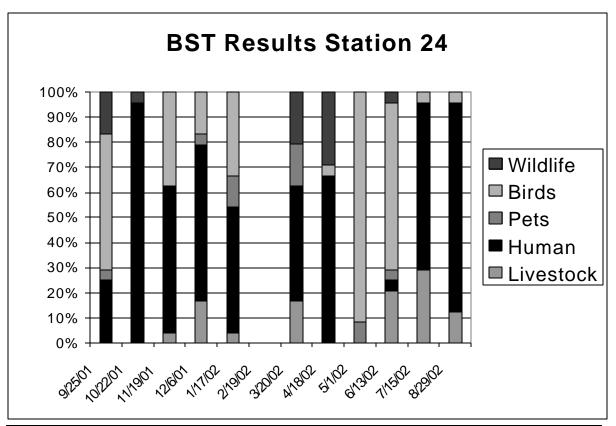


Figure 4-2

DATE	BACTERIA MPN/100ML	BIRDS	HUMAN	LIVESTOCK	PETS	WILDLIFE
9/25/01	39	83.33	12.5	0	0	4.17
10/22/01	43	8.33	91.67	0	0	C
11/19/01	43	12.5	75	12.5	0	0
12/6/01	43	20.83	54.17	25	0	0
1/17/02	3.6	20.83	58.33	4.17	0	16.67
2/19/02	2.9	0	100	0	0	0
3/20/02	240	0	62.5	0	0	37.5
4/18/02	43	0	91.67	0	0	8.33
5/1/02	2.9	29.17	58.33	4.17	4.17	4.17
6/13/02	9.1	25	8.33	4.17	37.5	25
7/15/02	9.1	12.5	75	8.33	0	4.17
8/29/02	15	25	70.83	4.17	0	(
Average		19.79	63.19	5.21	3.48	8.33

Figure 4-3 and its associated table, shows that the dominant contributing source to the bacterial levels of Killneck Creek is human in origin in all months of the study period except May, June and September. Birds were predominant sources during other months. It was not possible to determine the sources for the sample for February.

Figure 4-3

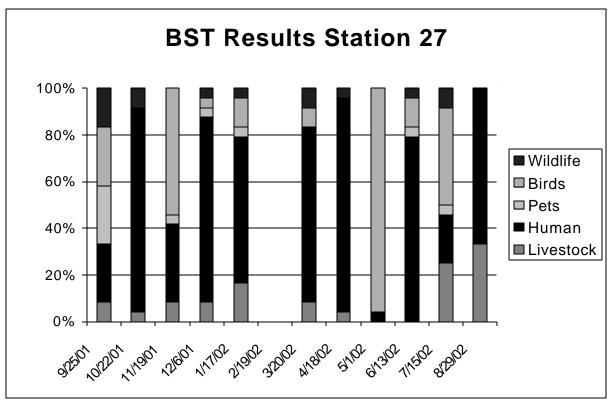


DATE	BACTERIA	BIRDS	HUMAN	LIVESTOCK	PETS	WILDLIFE
	MPN/100ML					
9/25/01	43	54.17	25	0	4.17	16.67
10/22/01	23	0	95.83	0	0	4.17
11/19/01	23	37.5	58.33	4.17	0	0
12/6/01	23	16.67	62.5	16.67	4.17	0
1/17/02	3.6	33.33	50	4.17	12.5	0
2/19/02	3.6	0	0	0	0	0
3/20/02	75	0	45.83	16.67	16.67	20.83
4/18/02	9.1	4.17	66.67	0	0	29.17
5/1/02	9.1	91.67	0	0	8.33	0
6/13/02	3.6	66.67	4.17	20.83	4.17	4.17
7/15/02	3.6	4.17	66.67	29.17	0	0
8/29/02	43	4.17	83.33	12.5	0	0
Average		28.41	50.76	9.47	4.55	6.82

### c). VAP A34E, DSS Closure Area 8-27-145 F. Stevens Point.

Figure 4-4 and its associated table, shows that the dominant contributing source to the bacterial levels of Stevens Point is human in origin in all months of the study period except May, July and November. Birds, livestock, and wildlife were minor sources during other months, with birds dominating May. It was not possible to determine the sources for the sample for February.

Figure 4-4



DATE	BACTERIA	BIRDS%	HUMAN%	LIVESTOCK	PETS%	WILDLIFE%
	MPN/100ML			%		
9/25/01	150	25	25	8.33	25	16.67
10/22/01	2.9	0	87.5	4.17	0	8.33
11/19/01	9.1	54.17	33.33	8.33	4.17	0
12/6/01	9.1	4.17	79.17	8.33	4.17	4.17
1/17/02	2.9	12.5	62.5	16.67	4.17	4.17
2/19/02	2.9	0	0	0	0	0
3/20/02	23	8.33	75	8.33	0	8.33
4/18/02	15	0	91.67	4.17	0	4.17
5/1/02	43	95.83	4.17	0	0	0
6/13/02	460	12.5	79.17	0	4.17	4.17
7/15/02	23	41.67	20.83	25	4.17	8.33
8/29/02	75	0	66.67	33.33	0	0
Average		23.11	56.82	10.61	4.17	5.3

### c). VAP A34E, DSS Closure Area 145 G. Coan River "Spit".

Figure 4-5 and its associated table, shows that the dominant contributing source to the bacterial levels of the "Spit" section of the Coan River remains predominantly human in origin in all months of the study period except May and August. Birds, livestock, and wildlife were minor sources during other months except for May when birds dominated and August when livestock dominated the bacterial load. Determination of bacterial sources for February was not possible.

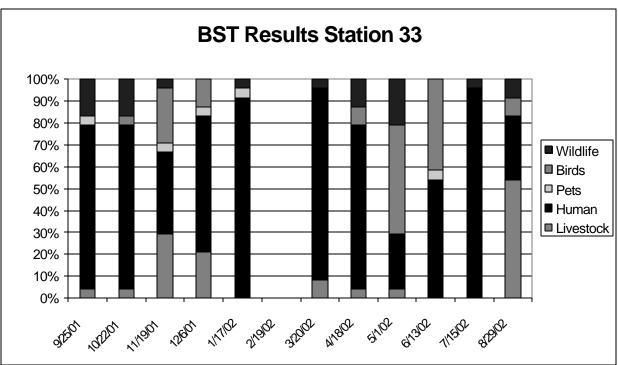


Figure 4-5

DATE	BACTERIA MPN/100ML	BIRDS	HUMAN	LIVESTOCK	PETS	WILDLIFE
9/25/01	93	0	75	4.17	4.17	16.67
10/22/01	93	4.17	75	4.17	0	16.67
11/19/01	23	25	37.5	29.17	4.17	4.17
12/6/01	23	12.5	62.5	20.83	4.17	0
1/17/02	3.6	0	91.67	0	4.17	4.17
2/19/02	2.9	0	0	0	0	0
3/20/02	23	0	87.5	8.33	0	4.17
4/18/02	3.6	8.33	75	4.17	0	12.5
5/1/02	9.1	50	25	4.17	0	20.83
6/13/02	9.1	41.67	54.17	0	4.17	0
7/15/02	2.9	0	95.83	0	0	4.17
8/29/02	23	8.33	29.17	54.17	0	8.33
Average		13.64	64.39	11.74	1.9	8.33

### c). VAP A34E, DSS Closure Area 145 H Coan River "M use" Area 1.

Figure 4-6 and its associated table, shows that the dominant source to the bacterial levels of this small section of the "M use" section of the Coan River dominated by human sources in 7 of 12 months. Birds, livestock, and pets were minor sources during most months except for May through August when livestock, birds and pets dominated the bacterial load. It was not possible to determine the sources for the sample for February.

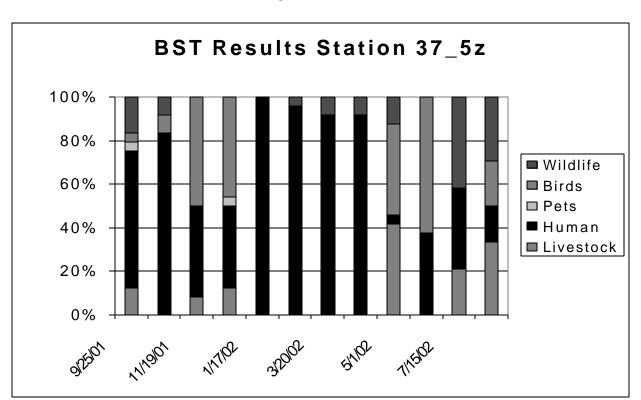


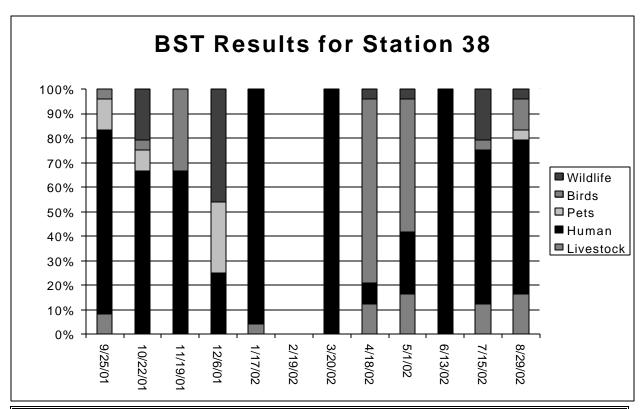
Figure 4-6

DATE	BACTERIA MPN/100ML	BIRDS	HUMAN	LIVESTOCK	PETS	WILDLIFE
9/25/01	43	4.17	62.5	12.5	4.17	16.67
10/22/01	23	8.33	83.33	0	0	8.33
11/19/01	150	50	41.67	8.33	0	0
12/6/01	93	45.83	37.5	12.5	4.17	0
1/17/02	15	0	100	0	0	0
2/19/02	3.6	0	95.83	0	0	4.17
3/20/02	9.1	0	91.67	0	0	8.33
4/18/02	93	0	91.67	0	0	8.33
5/1/02	23	41.67	4.17	41.67	0	12.5
6/13/02	9.1	62.5	37.5	0	0	0
7/15/02	23	0	37.5	20.83	0	41.67
8/29/02	93	20.83	16.67	33.33	0	29.17
Average		19.44	58.33	10.76	0.7	10.76

### c). VAP A34E, DSS Closure Area 145 H. Coan River "M use" Area 2.

Figure 4-7 and its associated table, shows that the dominant contributing source to the bacterial levels of the Coan River remains predominantly human in origin in all months of the study period except December, April, May. Birds, livestock, and wildlife where minor sources during other months except for April and May, when birds dominated, and December when wildlife dominated It was not possible to determine the sources for the sample for February.

Figure 4-7



DATE	BACTERIA	BIRDS	HUMAN	LIVESTOCK	PETS	WILDLIFE
	MPN/100ML					
9/25/01	23	4.17	75	8.33	12.5	0
10/22/01	9.1	4.17	66.67	0	8.33	20.83
11/19/01	93	33.33	66.67	0	0	0
12/6/01	23	0	25	0	29.17	45.83
1/17/02	3.6	0	95.83	4.17	0	0
2/19/02	2.9	0	0	0	0	0
3/20/02	43	0	100	0	0	0
4/18/02	240	75	8.33	12.5	0	4.17
5/1/02	43	54.17	25	16.67	0	4.17
6/13/02	3.6	0	100	0	0	0
7/15/02	9.1	4.17	62.5	12.5	0	20.83
8/29/02	23	12.5	62.5	16.67	4.17	4.17
Average		17.05	62.5	6.44	4.92	9.09

In summation these data clearly show that relative to other contributions, human contributions to the Coan River and its tributaries are dominant in all of the established shellfish closure areas. Field investigations of the watershed support this result that the presence of bacteria of human origin in the water body. This a source of concern from a public health perspective for both shellfish consumption and recreational use. Having determined both the in stream bacterial concentrations and the relative source contributions to the Coan River Shellfish closure a TMDL for each of these areas can be developed.

### **5.0 TMDL Development**

### **5.1 Simplified Modeling Approach (Tidal Volumetric Model):**

Personnel from EPA, Virginia DEQ, Virginia Department of Conservation and Recreation (DCR), Maryland Department of the Environment (MDE), Virginia DSS, Virginia Institute of Marine Sciences (VIMS), United States Geological Survey, Virginia Polytechnic University, James Madison University, and Tetra Tech composed the shellfish TMDL workgroup and developed a procedure for developing TMDLs using a simplified approach toward TMDL development. The goal of the procedure is to use bacteriological source tracking (BST) data to determine the relative sources of fecal coliform violations and use ambient water quality data to determine the load reductions needed to attain the applicable criteria. The Coan River watershed meets the criteria for using the simple modeling approach because it is a small watershed with no waste water treatment plant point sources for either industrial or municipal facilities. Further, land use is not complex in that it is highly homogenous with forests and agricultural land comprising greater than 90% of the land area.

### **5.2** The TMDL Calculation:

The most recent 30-months of data coinciding with the end of the TMDL study in August of 2002 have been reviewed to determine the loading to the water body. The approach insures compliance with the 90<sup>th</sup> percentile and geometric mean criteria. The geometric mean loading is based on the most recent 30-month geometric mean of fecal coliform. The load is also quantified for the 90<sup>th</sup> percentile of the 30-month grouping. The one exception to this analysis was station 24. Analysis of this station utilized an extended data period encompassing the last 30 months prior to November of 2002, its last date of closure. this was done because water quality data shows the station oscillates between not meeting standards and meeting standards. The area is frequently to shell-fishing.

### **5.2.1.** Geometric Mean Analysis:

The geometric mean load for each shellfish closure area at a representative monitoring station is determined by multiplying the geometric mean concentration based on the most recent 30-month period of record by the volume of the water. The acceptable load is then determined by multiplying the geometric mean criteria by the volume of the water. The load reductions needed for the attainment of the geometric mean are then determined by subtracting the acceptable load from the geometric mean load. Calculations of the geometric mean loads and allowable geometric mean loads are shown in Table 5-1.

Example: (Geometric Mean Value MPN/100ml) x (volume) = Existing Load

(Criteria Value 14 MPN/100ml) x (volume) = Allowable Load

Existing Load – Allowable Load = Load Reduction

Table 5-1 Geometric Mean Calculations for the Coan River TMDL's

CLOSURE	GEO –	SEGMENT	VOLUME X	VOLUME X	(ALLOWED	REQUIRED
ID AND	METRIC	VOLUME	GEO – MEAN	CRITERIA	LOAD )-	REDUCTIO
STATION	MEAN	(CUBIC	= EXISTING	(14MPN/100ML)	(EXISTING	N IN
NUMBER		METERS)	LOAD	= ALLOWED	LOAD)	PERCENT
				LOAD		
145 – D	17.36	267,565	4.64E+10	3.75E+10	1.64E+11	19.35%
STATION 20						
145 – E	10.9	122,851	1.34E+10	1.72E+10	-3.80E+09	0%
STATION 24						
145 – F	13.76	117,284	1.61E+10	1.64E+10	-4.13E+10	0%
STATION 27						
145 – G	11.24	39,615	4.45E+09	5.55E+09	-1.50E+10	0%
STATION 33						
145 – H	24.83	43,076	1.07E+10	6.03E+09	-1.04E+10	0%
STATION						
37_5Z						
145 – I	13.86	1,112,690	1.54E+11	1.56E+11	-1.55E+11	0%
STATION 38						

# **5.2.2.** 90<sup>th</sup> Percentile Analysis:

The 90<sup>th</sup> percentile load is determined by multiplying the 90<sup>th</sup> percentile concentration, based on the most appropriate 30-month period of record, by the volume of the water. The acceptable load is determined by multiplying the 90<sup>th</sup> percentile criteria by the volume of the water. The load reductions needed for the attainment of the 90<sup>th</sup> percentile criteria are determined by subtracting the acceptable load from the 90<sup>th</sup> percentile load. This is shown in Table 5-2. The more stringent reductions between the two methods is be used for the TMDL.

A comparison of the geometric mean data and the 90<sup>th</sup> percentile data for the last 30 months shows that the 90<sup>th</sup> percentile data is the more stringent criteria. In essence the 90<sup>th</sup> percentile criteria is that criteria most frequently exceeded and it is reductions in these bacterial loadings that will yield water quality improvements which address the water quality standard. Therefore the 90<sup>th</sup> percentile loading is combined with the results of the bacterial source tracking (BST) to allocate source contributions and establish load reduction targets among the various contributing sources.

Table 5-2 90<sup>th</sup> Percentile Calculations for the Coan River TMDL's

CLOSURE ID AND STATION NUMBER	90 <sup>TH</sup> PERCENT. VALUE (MPN/100 ML)	SEGMENT VOLUME (CUBIC METERS)	VOLUME X 90 <sup>TH</sup> PERCENT. VALUE = ACTUAL LOAD	VOLUME X 90 <sup>TH</sup> CRITERIA (49MPN/100ML) = LOAD ALLOCATION	(ALLOW- ABLE LOAD )- (EXISTING LOAD) = LOAD REDUCTION	REQUIRED LOAD REDUCTION IN PERCENT
145 – D STATION 20	103.9	267,565	2.78E+11	1.31E+11	1.47E+11	52.84%
145 – E STATION 24	56.28	122,851	6.91E+10	6.02E+10	8.94E+09	12.93%
145 – F STATION 27	84.4	117,284	9.90E+10	5.75E+10	4.15E+10	41.94%
145 – G STATION 33	55.8	39,615	2.21E+10	1.94E+10	2.69E+09	12.19%
145 – H STATION 37_5Z	147.6	43,076	6.36E+10	2.11E+10	4.25E+10	66.80%
145 – I STATION 38	67.9	1,112,690	7.56E+11	5.45E+11	2.10E+11	27.84%

### **5.2.3. BST Data:**

The BST data determines the percent loading for each of the major source categories and is used to determine where load reductions are needed. Since one BST sample per month was collecated for a period of one year for each TMDL, the percent loading per source were averaged over the 12 month period because there where no seasonal differences between sources. The percent loading by source is multiplied by the 90<sup>th</sup> percentile load to determine the load by source. The percent reduction needed to attain the water quality standard or criteria are allocated to each source category. This is shown in Table 5-3 and serves to fulfill the TMDL requirements by insuring that the criteria is attained. Additionally it ensures that all sources and loadings are identified and quantified via the BST and mathematical calculations, season variability is addressed, and critical conditions are identified. This data is graphical represented as the annual average BST in Figure 5-1.

Table 5-3 REDUCTION BASED UPON 90TH PERCENTILE STANDARD

AREA 145-D STATION 8-20	BST Result % of total load	Actual Load (cfu)*	Load Allocation (cfu)*	Reduction needed
Total	100%	2.78E+11	1.31E+11	53%
Bird	23%	2.08E+10	2.08E+10	0%
Wildlife	5%	4.95E+09	4.95E+09	0%
Human	57%	5.15E+10	1.79E+10	65%
Pets	4%	3.96E+09	3.96E+09	0%
Livestock	11%	9.90E+09	9.90E+09	0%

Table 5-3 REDUCTION BASED UPON 90TH PERCENTILE STANDARD CONTINUED

AREA 145-E STATION 8-24	BST Result % of total load	Actual Load (cfu)*	Load Allocation (cfu)*	Reduction needed
Total	100%	6.91E+10	6.02E+10	12.93%
Bird	28%	1.93E+10	1.93E+10	0.00%
Wildlife	7%	4.84E+09	4.84E+09	0.00%
Human	51%	3.52E+10	2.64E+10	25.20%
Pets	9%	6.22E+09	6.22E+09	0.00%
Livestock	5%	3.46E+09	3.46E+09	0.00%

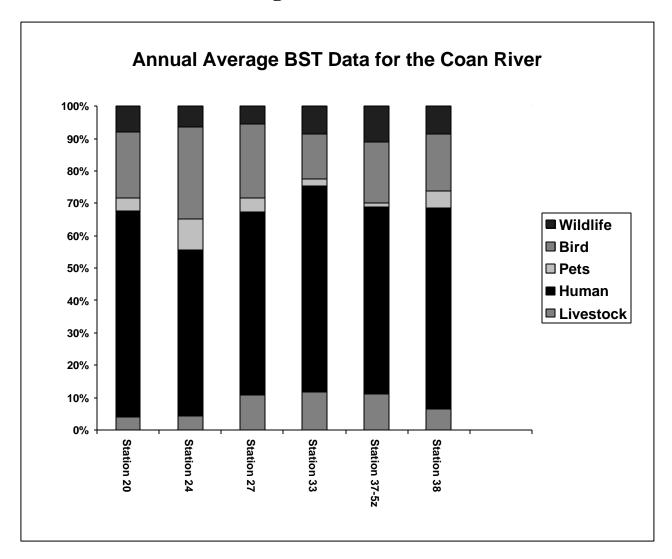
AREA 145-F STATION 8-27	BST Result % of total load	Actual Load (cfu)*	Load Allocation (cfu)*	Reduction needed
Total	100%	9.90E+10	5.75E+10	42%
Bird	23%	2.08E+10	2.08E+10	0%
Wildlife	5%	4.95E+09	4.95E+09	0%
Human	57%	5.15E+10	1.79E+10	65%
Pets	4%	3.96E+09	3.96E+09	0%
Livestock	11%	9.90E+09	9.90E+09	0%

AREA 145-G STATION 8-33	BST Result % of total load	Actual Load (cfu)*	Load Allocation (cfu)*	Reduction needed
Total	100%	2.21E+09	1.94E+09	12%
Bird	14%	3.09E+08	3.09E+08	0%
Wildlife	8%	1.77E+08	1.77E+08	0%
Human	64%	1.41E+09	1.15E+09	19%
Pets	2%	4.42E+07	4.42E+07	0%
Livestock	12%	2.65E+08	2.65E+08	0%

AREA 145-H STATION 8-37 5Z	BST Result % of total load	Actual Load (cfu)*	Load Allocation (cfu)*	Reduction needed
Total	100%	6.36E+10	2.11E+10	67%
Bird	19%	1.21E+10	1.21E+10	0%
Wildlife	11%	7.00E+09	7.00E+09	0%
Human	58%	3.69E+10	3.69E+07	100%
Pets	1%	6.36E+08	6.36E+08	0%
Livestock	11%	7.00E+09	1.33E+09	81%

AREA 145-I	BST Result	Actual Load (cfu)*	Load Allocation	Reduction needed
STATION 8-38	% of total load		(cfu)*	
Total	100%	7.56E+11	5.45E+11	28%
Bird	17%	1.29E+11	1.29E+11	0%
Wildlife	9%	6.80E+10	6.80E+10	0%
Human	63%	4.76E+11	2.64E+11	45%
Pets	5%	3.78E+10	3.78E+10	0%
Livestock	6%	4.54E+10	4.54E+10	0%

Figure 5-1



### 5.3. Consideration of Critical Conditions and Margin of Safety

EPA regulations at 40 CFR 130.7 (c)(1) require TMDLs to take into account critical conditions for stream flow, loading, and water quality parameters. The intent of this requirement is to ensure that the water quality of the Coan River and its tributaries are protected during times when they are most vulnerable. Critical conditions are important because they describe the factors that combine to cause a violation of water quality standards and help in identifying the actions that may have to be undertaken to meet water quality standards.

The sources of bacteria for the Coan River estuary are a mixture of dry and wet weather driven sources. This TMDL development utilized the volumetric load determination approach the results of which are summarized in Table 5.4. Addressing the critical conditions for this watershed is implicit in this methodology as used in this TMDL development in part because the entire volume of the impaired segment is utilized rather than only a portion of the water column. Because there was very little seasonality in BST results and in the measured concentrations of fecal coliforms, an averaging approach to load allocation in the watershed was considered justified. Additionally, a margin of safety is implied in this approach as it is developed to target the highest level at which the ambient levels exceed the water quality standard, assumes no flushing, and has a conservative assimilation capacity.

Table 5.4 TMDL Summary for Six Closures in the Coan River Watershed

Water Body /	Pollutant	TMDL	Waste	Load Allocation	Margin of
Closure ID/	Identified	c.f.u.*	Load	c.f.u.*	Safety
Closure area/			Allocation		
Station no.			c.f.u.*		
Coan River 145 D	Fecal	1.31 E+11	0	1.31 E+11	Implicit
Station 8-20	Coliform				
Coan River 145 E	Fecal	6.02 E+10	0	6.02 E+10	Implicit
Station 8-24	Coliform				
Coan River 145 F	Fecal	5.75 E+10	0	5.75 E+10	Implicit
Station 8-27	Coliform				
Coan River 145 G	Fecal	1.94 E+09	0	1.94 E+09	Implicit
Station 8-33	Coliform				
Coan River 145 H	Fecal	2.11 E+10	0	2.11 E+10	Implicit
Station 8-37.5Z	Coliform				
Coan River 145 I	Fecal	5.45 E+11	0	5.45 E+11	Implicit
Station 8-38	Coliform				

<sup>\*</sup> c.f.u. = colony forming units of bacteria

#### **5.4.** Consideration of Seasonal Variations

Seasonal variations involve changes in surface runoff, stream flow, and water quality as a result of hydrologic and climatological patterns. The volumetric approach examines the pattern of water quality through a combination of the BST as compared to recent rainfall events in order to consider seasonal variations. This permits consideration of temporal variability in fecal coliform sources, such as migrating duck and goose populations, within the watershed. In the time period that this BST was collected historic drought conditions prevailed throughout Virginia. Improvement in accuracy in the BST increases as conditions are averaged over time. However this never exceeds 30 months as the basis for the water quality standard.

# **6.0 Implementation**

The goal of the TMDL program is to establish a three-step path that will lead to attainment of water quality standards. The first step in the process is to develop TMDLs that will result in meeting water quality standards. This report represents the culmination of that effort for the bacterial impairments for segments located on the on the Coan River. The second step is to develop a TMDL implementation plan. The final step is to implement the TMDL implementation plan, and to monitor stream water quality to determine if water quality standards are being attained.

Once a TMDL has been approved by EPA, measures must be taken to reduce pollution levels in the impaired segments. These measures, which can include where appropriate the use of better treatment technology or the installation of best management practices (BMPs), that are implemented in an iterative process that is described along with specific BMPs in the implementation plan. The process for developing an implementation plan has been described in the recent "TMDL Implementation Plan Guidance Manual", published in July 2003 and is available upon request from the DEQ and DCR TMDL project staff or at <a href="http://www.deq.state.va.us/tmdl/implans/ipguide.pdf">http://www.deq.state.va.us/tmdl/implans/ipguide.pdf</a> With successful completion of implementation plans, Virginia will be well on the way to restoring impaired waters and enhancing the value of this important resource. Additionally, development of an approved implementation plan will improve a locality's chances for obtaining financial and technical assistance during implementation.

# **6.1 Staged Implementation**

In general, Virginia intends for the required reductions to be implemented in an iterative process that first addresses those sources with the largest impact on water quality. The iterative implementation of BMPs in the watershed has several benefits:

- 1. It enables tracking of water quality improvements following BMP implementation through follow-up stream monitoring;
- 2. It provides a measure of quality control, given the uncertainties inherent in computer simulation modeling;

- 3. It provides a mechanism for developing public support through periodic updates on BMP implementation and water quality improvements;
- 4. It helps ensure that the most cost effective practices are implemented first; and
- 5. It allows for the evaluation of the adequacy of the TMDL in achieving water quality standards.

Watershed stakeholders will have opportunity to participate in the development of the TMDL implementation plan. Specific goals for BMP implementation will be established as part of the implementation plan development

# **6.2** Link to ongoing Restoration Efforts

Implementation of this TMDL will contribute to on-going water quality improvement efforts aimed at restoring water quality in the Chesapeake Bay. A tributary strategy has been developed for the Potomac River Embayments. Up-to-date information on tributary strategy development can be found at

http://www.snr.state.va.us/Initiatives/TributaryStrategies/shenandoah.cfm.

# **6.3** Reasonable Assurance for Implementation

# **6.3.1 Follow-Up Monitoring**

VDH-DSS will continue sampling at the established bacteriological monitoring stations in accordance with its shellfish monitoring program. VADEQ will continue to use data from these monitoring stations and related ambient monitoring stations to evaluate improvements in the bacterial community and the effectiveness of TMDL implementation in attainment of the general water quality standard.

#### **6.3.2. Regulatory Framework**

While section 303(d) of the Clean Water Act and current EPA regulations do not require the development of TMDL implementation plans as part of the TMDL process, they do require reasonable assurance that the load and wasteload allocations can and will be implemented. Additionally, Virginia's 1997 Water Quality Monitoring, Information and Restoration Act (the "Act") directs the State Water Control Board to "develop and implement a plan to achieve fully supporting status for impaired waters" (Section 62.1-44.19.7). The Act also establishes that the implementation plan shall include the date of expected achievement of water quality objectives, measurable goals, corrective actions necessary and the associated costs, benefits and environmental impacts of addressing the impairments. EPA outlines the minimum elements of an approvable implementation plan in its 1999 "Guidance for Water Quality-Based Decisions: The TMDL Process." The listed elements include implementation actions/management measures, timelines, legal or regulatory controls, time required to attain water quality standards, monitoring plans and milestones for attaining water quality standards.

Once developed, DEQ intends to incorporate the TMDL implementation plan into the appropriate Water Quality Management Plan (WQMP), in accordance with the Clean Water Act's Section 303(e). In response to a Memorandum of Understanding (MOU) between EPA and DEQ, DEQ also submitted a draft Continuous Planning Process to EPA in which DEQ commits to regularly updating the WQMPs. Thus, the WQMPs will be, among other things, the repository for all TMDLs and TMDL implementation plans developed within a river basin.

# **6.3.3.** Implementation Funding Sources

One potential source of funding for TMDL implementation is Section 319 of the Clean Water Act. Section 319 funding is a major source of funds for Virginia's Non-point Source Management Program. Other funding sources for implementation include the U.S. Department of Agriculture's Conservation Reserve Enhancement and Environmental Quality Incentive Programs, the Virginia State Revolving Loan Program, and the Virginia Water Quality Improvement Fund. The TMDL Implementation Plan Guidance Manual contains additional information on funding sources, as well as government agencies that might support implementation efforts and suggestions for integrating TMDL implementation with other watershed planning efforts.

# **6.3.4 Addressing Wildlife Contributions**

In some waters for which TMDLs have been developed, water quality modeling indicates that even after removal of all of the sources of bacteria (other than wildlife), the stream will not attain standards under all flow regimes at all times. This is not the is the case for the Coan River. However, neither the Commonwealth of Virginia, nor EPA are proposing the elimination of wildlife to allow for the attainment of water quality standards. This is obviously an impractical and wholly undesirable action. While managing over-populations of wildlife remains as an option to local stakeholders, the reduction of wildlife or changing a natural background condition is not the intended goal of a TMDL.

Based on the above, EPA and Virginia have developed a TMDL strategy to address the wildlife issue. The first step in this strategy is to develop a reduction goal such as presented in Table 5.4. The pollutant reductions for the interim goal are applied only to controllable, anthropogenic sources identified in the TMDL, setting aside any control strategies for wildlife. During the first implementation phase all controllable sources would be reduced to the maximum extent practicable using the staged approach outlined above. Following completion of the first phase, DEQ would re-assess water quality in the stream to determine if the water quality standard is attained. This effort will also evaluate if the technical assumptions were correct. If water quality standards are not being met, a UAA may be initiated to reflect the presence of naturally high bacteria levels

due to uncontrollable sources. In some cases, the effort may never have to go to the second phase because the water quality standard exceedances attributed to wildlife in the are very small and infrequent and fall within the margin of error.

# 7.0. Public Participation

The development of the Coan River TMDL would not have been possible without public participation. Two stakeholder meetings were held at the Northumberland County Library in Heathsville, Virginia on February 2002 and again in May 2003 to discuss the process for TMDL development and the source assessment results. Sixteen 16 people representing state and local government, private citizens and academic research institutions attended each meeting. A list of the organizations present is provided in Appendix C. Copies of the presentation materials were available for public distribution and subsequently posted on the VADEQ web page.

The formal notice of the public meeting was printed in the Virginia Register on June 30, 2003. Notices were also published in two local area newspapers. The public meeting was held at the Northumberland County Courthouse on June 22, 2003. Members of the County Board of Supervisors, concerned citizens, affected state agencies attended. A formal presentation of the results contained in this TMDL report was made by DEQ staff and public comment solicited. A copy of the presentation was made available at the meeting and on the DEQ website. The attendance list for the public meeting and the questions asked by the participants is shown in Appendix C. There followed a 30-day public comment period and no written comments were received.

Generally, the public comment garnered at the meeting focused on the issue of how the implementation of the TMDL could be funded. Secondary issues, such as potential bacterial sources, changes in use designation, and concerns over the regulatory consequences of not meeting the TMDL load allocation. A summary of these questions and the answers by DEQ staff is also found in Appendix C.

#### References

Hagedorn, Charles and Szeles, Cheryl. 1998. Nonpoint Sources of Fecal Contamination in the Coan River and Little Wicomico River WatershedsFinal Report presented to The Virginia Department of Environmental Quality.

Southeast Regional Climate center, <a href="mailto:sercc@dnr.state.sc.us">sercc@dnr.state.sc.us</a>

Virginia Department of Health, October 30,2000. <u>Little Wicomico River, Northumberland County, Shoreline Sanitary Survey.</u>

Virginia National Land Cover Data (NLCD) Version 05-27-99.

#### **GLOSSARY**

# Note: All entries in italics are taken from USEPA (1998).

**303(d).** A section of the Clean Water Act of 1972 requiring states to identify and list water bodies that do not meet the states' water quality standards.

Allocations. That portion of a receiving water's loading capacity attributed to one of its existing or future pollution sources (nonpoint or point) or to natural background sources. (A wasteload allocation [WLA] is that portion of the loading capacity allocated to an existing or future point source, and a load allocation [LA] is that portion allocated to an existing or future nonpoint source or to natural background levels. Load allocations are best estimates of the loading, which can range from reasonably accurate estimates to gross allotments, depending on the availability of data and appropriate techniques for predicting loading.)

**Ambient water quality.** Natural concentration of water quality constituents prior to mixing of either point or nonpoint source load of contaminants. Reference ambient concentration is used to indicate the concentration of a chemical that will not cause adverse impact on human health.

**Anthropogenic.** Pertains to the [environmental] influence of human activities.

**Bacteria.** Single-celled microorganisms. Bacteria of the coliform group are considered the primary indicators of fecal contamination and are often used to assess water quality.

**Bacterial source tracking (BST).** A collection of scientific methods used to track sources of fecal contamination.

**Best management practices (BMPs).** Methods, measures, or practices determined to be reasonable and cost-effective means for a landowner to meet certain, generally nonpoint source, pollution control needs. BMPs include structural and nonstructural controls and operation and maintenance procedures.

Clean Water Act (CWA). The Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972), Public Law 92-500, as amended by Public Law 96-483 and Public Law 97-117, 33 U.S.C. 1251 et seq. The Clean Water Act (CWA) contains a number of provisions to restore and maintain the quality of the nation's water resources. One of these provisions is section 303(d), which establishes the TMDL program.

**Concentration.** Amount of a substance or material in a given unit volume of solution; usually measured in milligrams per liter (mg/L) or parts per million (ppm).

**Contamination.** The act of polluting or making impure; any indication of chemical, sediment, or biological impurities.

**Cost-share program.** A program that allocates project funds to pay a percentage of the cost of constructing or implementing a best management practice. The remainder of the costs is paid by the producer(s).

**Critical condition.** The critical condition can be thought of as the "worst case" scenario of environmental conditions in the waterbody in which the loading expressed in the TMDL for the pollutant of concern will continue to meet water quality standards. Critical conditions are the combination of environmental factors (e.g., flow, temperature, etc.) that results in attaining and maintaining the water quality criterion and has an acceptably low frequency of occurrence.

**Designated uses.** Those uses specified in water quality standards for each waterbody or segment whether or not they are being attained.

**Domestic wastewater.** Also called sanitary wastewater, consists of wastewater discharged from residences and from commercial, institutional, and similar facilities.

**Drainage basin.** A part of a land area enclosed by a topographic divide from which direct surface runoff from precipitation normally drains by gravity into a receiving water. Also referred to as a watershed, river basin, or hydrologic unit.

**Existing use.** Use actually attained in the waterbody on or after November 28, 1975, whether or not it is included in the water quality standards (40 CFR 131.3).

**Fecal Coliform.** Indicator organisms (organisms indicating presence of pathogens) associated with the digestive tract.

**Geometric mean.** A measure of the central tendency of a data set that minimizes the effects of extreme values.

**GIS.** Geographic Information System. A system of hardware, software, data, people, organizations and institutional arrangements for collecting, storing, analyzing and disseminating information about areas of the earth. (Dueker and Kjerne, 1989) **Infiltration capacity.** The capacity of a soil to allow water to infiltrate into or through it

**Infiltration capacity.** The capacity of a soil to allow water to infiltrate into or through i during a storm.

**Interflow.** Runoff that travels just below the surface of the soil.

**Loading, Load, Loading rate.** The total amount of material (pollutants) entering the system from one or multiple sources; measured as a rate in weight per unit time.

**Load allocation (LA).** The portion of a receiving waters loading capacity attributed either to one of its existing or future nonpoint sources of pollution or to natural background sources. Load allocations are best estimates of the loading, which can range from reasonably accurate estimates to gross allotments, depending on the availability of data and appropriate techniques for predicting the loading. Wherever possible, natural and nonpoint source loads should be distinguished (40 CFR 130.2(g)).

**Loading capacity (LC).** The greatest amount of loading a water can receive without violating water quality standards.

**Margin of safety (MOS).** A required component of the TMDL that accounts for the uncertainty about the relationship between the pollutant loads and the quality of the receiving waterbody (CWA section 303(d)(1)©). The MOS is normally incorporated into the conservative assumptions used to develop TMDLs (generally within the calculations or models) and approved by EPA either individually or in state/EPA agreements. If the MOS needs to be larger than that which is allowed through the conservative assumptions, additional MOS can be added as a separate component of the TMDL (in this case, quantitatively, a TMDL = LC = WLA + LA + MOS).

**Mean.** The sum of the values in a data set divided by the number of values in the data set. **Monitoring.** Periodic or continuous surveillance or testing to determine the level of compliance with statutory requirements and/or pollutant levels in various media or in humans, plants, and animals.

**Narrative criteria.** Nonquantitative guidelines that describe the desired water quality goals.

**Nonpoint source.** Pollution that originates from multiple sources over a relatively large area. Nonpoint sources can be divided into source activities related to either land or water use including failing septic tanks, improper animal-keeping practices, forest practices, and urban and rural runoff.

**Numeric targets.** A measurable value determined for the pollutant of concern, which, if achieved, is expected to result in the attainment of water quality standards in the listed waterbody.

**Point source.** Pollutant loads discharged at a specific location from pipes, outfalls, and conveyance channels from either municipal wastewater treatment plants or industrial waste treatment facilities. Point sources can also include pollutant loads contributed by tributaries to the main receiving water stream or river.

**Pollutant.** Dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water. (CWA section 502(6)).

**Pollution.** Generally, the presence of matter or energy whose nature, location, or quantity produces undesired environmental effects. Under the Clean Water Act, for example, the term is defined as the man-made or man-induced alteration of the physical, biological, chemical, and radiological integrity of water.

**Privately owned treatment works.** Any device or system that is (a) used to treat wastes from any facility whose operator is not the operator of the treatment works and (b) not a publicly owned treatment works.

**Public comment period.** The time allowed for the public to express its views and concerns regarding action by EPA or states (e.g., a Federal Register notice of a proposed rule-making, a public notice of a draft permit, or a Notice of Intent to Deny).

**Publicly owned treatment works (POTW).** Any device or system used in the treatment (including recycling and reclamation) of municipal sewage or industrial wastes of a liquid nature that is owned by a state or municipality. This definition includes sewers, pipes, or other conveyances only if they convey wastewater to a POTW providing treatment.

Raw sewage. Untreated municipal sewage.

**Receiving waters.** Creeks, streams, rivers, lakes, estuaries, ground-water formations, or other bodies of water into which surface water and/or treated or untreated waste are discharged, either naturally or in man-made systems.

**Riparian areas.** Areas bordering streams, lakes, rivers, and other watercourses. These areas have high water tables and support plants that require saturated soils during all or part of the year. Riparian areas include both wetland and upland zones.

**Riparian zone.** The border or banks of a stream. Although this term is sometimes used interchangeably with floodplain, the riparian zone is generally regarded as relatively narrow compared to a floodplain. The duration of flooding is generally much shorter, and the timing less predictable, in a riparian zone than in a river floodplain.

**Runoff.** That part of precipitation, snowmelt, or irrigation water that runs off the land into streams or other surface water. It can carry pollutants from the air and land into receiving waters.

**Septic system.** An on-site system designed to treat and dispose of domestic sewage. A typical septic system consists of a tank that receives waste from a residence or business and a drain field or subsurface absorption system consisting of a series of percolation lines for the disposal of the liquid effluent. Solids (sludge) that remain after decomposition by bacteria in the tank must be pumped out periodically.

**Sewer.** A channel or conduit that carries wastewater and storm water runoff from the source to a treatment plant or receiving stream. Sanitary sewers carry household, industrial, and commercial waste. Storm sewers carry runoff from rain or snow. Combined sewers handle both.

**Slope.** The degree of inclination to the horizontal. Usually expressed as a ratio, such as 1:25 or 1 on 25, indicating one unit vertical rise in 25 units of horizontal distance, or in a decimal fraction (0.04), degrees (2 degrees 18 minutes), or percent (4 percent).

**Stakeholder.** Any person with a vested interest in the TMDL development.

**Surface area.** The area of the surface of a waterbody; best measured by planimetry or the use of a geographic information system.

**Surface runoff.** Precipitation, snowmelt, or irrigation water in excess of what can infiltrate the soil surface and be stored in small surface depressions; a major transporter of nonpoint source pollutants.

**Surface water.** All water naturally open to the atmosphere (rivers, lakes, reservoirs, ponds, streams, impoundments, seas, estuaries, etc.) and all springs, wells, or other collectors directly influenced by surface water.

**Topography.** The physical features of a geographic surface area including relative elevations and the positions of natural and man-made features.

**Total Maximum Daily Load (TMDL).** The sum of the individual wasteload allocations (WLAs) for point sources, load allocations (LAs) for nonpoint sources and natural background, plus a margin of safety (MOS). TMDLs can be expressed in terms of mass per time, toxicity, or other appropriate measures that relate to a state's water quality standard.

**VADEO.** Virginia Department of Environmental Quality.

**VDH.** Virginia Department of Health.

**Virginia Pollutant Discharge Elimination System (NPDES).** The national program for issuing, modifying, revoking and re-issuing, terminating, monitoring, and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the Clean Water Act.

**Wasteload allocation (WLA).** The portion of a receiving waters' loading capacity that is allocated to one of its existing or future point sources of pollution. WLAs constitute a type of water quality-based effluent limitation (40 CFR 130.2(h)).

**Wastewater.** Usually refers to effluent from a sewage treatment plant. See also **Domestic wastewater**.

**Wastewater treatment.** Chemical, biological, and mechanical procedures applied to an industrial or municipal discharge or to any other sources of contaminated water to remove, reduce, or neutralize contaminants.

**Water quality.** The biological, chemical, and physical conditions of a waterbody. It is a measure of a waterbody's ability to support beneficial uses.

Water quality criteria. Levels of water quality expected to render a body of water suitable for its designated use, composed of numeric and narrative criteria. Numeric criteria are scientifically derived ambient concentrations developed by EPA or states for various pollutants of concern to protect human health and aquatic life. Narrative criteria are statements that describe the desired water quality goal. Criteria are based on specific levels of pollutants that would make the water harmful if used for drinking, swimming, farming, fish production, or industrial processes.

Water quality standard. Law or regulation that consists of the beneficial designated use or uses of a waterbody, the numeric and narrative water quality criteria that are necessary to protect the use or uses of that particular waterbody, and an antidegradation statement. Watershed. A drainage area or basin in which all land and water areas drain or flow toward a central collector such as a stream, river, or lake at a lower elevation. WQIA. Water Quality Improvement Act.

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# **APPENDIX A**

- 1) Sanitary Shoreline Survey for the Coan River Watershed
- 2) Condemnation Area Notice 145

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E. ANNE PETERSON, M.D., M.P.H. STATE HEALTH COMMISSIONER Department of Health
P O BOX 2448
RICHMOND, VA 23218

TDD 1-800-828-1120

#### COAN RIVER, THE GLEBE AND KINGSCOTE CREEK

Northumberland County

Shoreline Sanitary Survey

Date: September 14, 2001

Survey Period: June 4 - September 10, 2001

Total Number of Properties Surveyed: 1047

Survey By: J. E. Davis and J. D. Dickerson

#### Section A: General

This survey area extends from Reference Point 8 at the end of State Route 680 (extended to the shoreline) to Reference Point 9 at Great Point, including the Potomac River shoreline between these two points, Garners Creek, Judith Sound, Kingscote Creek, The Glebe (Wrights Cove, Glebe Creek), Coan River (Killneck Creek, Mill Creek, Coan Mill Stream, Headley Creek, Boathouse Pond), Balls Creek and all of their tributaries. The survey boundary has been revised. See map for current boundary.

The topography in this area varies from 5' or less along the shoreline to a maximum of 150' at the southwestern edge of the survey boundary. The population density is mostly sparse with heavier concentrations around the various communities and subdivisions along the shoreline. The economy is based primarily on agriculture, seafood and service oriented businesses.

Meteorological data indicated that 7.22" of rain fell June 4-30, 8.62" July 1-31, 8.81" August 1-31, and .21" September 1-10 for a total of 24.86" for the survey period.

The current restriction on shellfish harvesting is Condemned Shellfish Area #145, Coan River and The Glebe, revised 18 November 1999. A copy of the current condemnation notice and map is attached to the back of this report.

Information in this report is gathered by and primarily for the use of the Division of Shellfish Sanitation, Virginia Department of Health, in order to fulfill its responsibilities of shellfish growing area supervision and classification. However, the data is made available to various agencies participating in shellfish program coordinated activities and other interested parties



Report copies are provided to the local health department for corrective action of deficiencies listed on the summary page in Section B.2 and the Department of Environmental Quality, Water Regional Office for possible action at the properties listed on the summary page in Sections C.1 and C.2. The Division of Soil and Water Conservation is provided information on possible sources of animal pollution found in Section E.

This report lists only those properties that have a sanitary deficiency or other environmental significance. "DIRECT" indicates that the significant activity or deficiency has a direct impact on shellfish waters. Individual field forms with full information on properties listed in this report are on file in the Richmond Office of the Division of Shellfish Sanitation and available for reference until superseded by a subsequent re-survey of the area.

#### **SECTION B: SEWAGE POLLUTION SOURCES**

#### SEWAGE TREATMENT WORKS

#### -None

#### **ONSITE SEWAGE DEFICIENCIES**

#### 1. CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes)

Dwelling- white asbestos and vinyl siding 1 story. 2 persons. Laundry wastes discharge through a '/~" garden hose onto ground surface. Sanitary Notice issued 7-13-01 to field #A37.

#### 2. CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes) -

Dwelling- light grey vinyl siding 2 story with white trim. 2 persons. Laundry wastes discharge through a 1 " white PVC pipe into a 4" black plastic pipe onto ground surface. Sanitary Notice issued 7-19-01 to field #A59.

#### 3. CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes) -

Dwelling- tan cement block and frame 1'/z story with white trim. No contact. Laundry wastes discharge through a 2" white PVC pipe onto ground surface. Sanitary Notice issued 7-20-01 to field #A86.

#### 5. CONTRIBUTES POLLUTION - Location

Dwelling- white asbestos shingle 1'/~ story with grey shutters. No contact. Recent eruption of effluent from septic tank and drainfield onto ground surface. Sanitary Notice issued 7-24-01 to field #A96.

#### 6. CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes) -

Dwelling- tan frame 1 story with dark brown trim. No contact. Kitchen wastes discharge through a broken 2" tan PVC pipe onto ground surface. Sanitary Notice issued 7-25-01 to field #A112.

#### 9. CONTRIBUTES POLLUTION -

Dwelling- white house trailer with grey trim. 2 persons. Effluent erupting rom drainfield onto ground surface. Sanitary Notice issued 8-1-01 to field #A150.

# 12. CONTRIBUTES POLLUTION

Dwelling-tan frame 1 story with a red door. No contact. Effluent erupting from an exposed drainline onto ground surface. Sanitary Notice issued 8-6-01 to field #A160.

21.

23.

CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes) -13. Dwelling- tan cement block 1 story with dark brown trim and shutters. No contact. Laundry wastes discharge through a 1 " black rubber hose onto ground surface. Sanitary Notice issued 8-6-01 to field #A211.

14. CONTRIBUTES POLLUTION -. Dwelling- cream frame 1 story with dark brown trim and shutters. No contact. Privy full to riser. Sanitary Notice issued 8-8-01 to field #A238.

CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes), DIRECT-15.

> . Dwelling- brick 1 story with white trim and shutters. No contact. Laundry wastes discharge through a 2" red rubber hose into a swale that drains to an unnamed tributary of The Glebe. Sanitary Notice issued 8-16-01 to field #A262.

NO FACILITIES -16. Dwelling- tan frame 1 story cottage with white trim. No contact. Sanitary Notice issued 8-16-01 to field #A270.

17. NO FACILITIES -. Dwelling- white house trailer with brown shutters. No contact. Sanitary Notice issued 8-16-01 to field #A278.

- 18. CONTRIBUTES POLLUTION -. Dwelling- white frame 2 story. 3 persons. Effluent erupting from drainfield onto ground surface. Sanitary Notice issued 8-21-01 to field #A308.
- 19. CONTRIBUTES POLLUTION Dwelling- brick 1 story with white trim and green shutters. 1 person. Effluent erupting from septic tank onto ground surface. Sanitary Notice issued 9-6-01 to field #659.
- CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes) -20. . Dwelling- white vinyl siding 2 story. 1 person. Laundry wastes discharge through a 2" black plastic hose onto ground surface. Sanitary Notice issued 8-30-01 to field #615.
- Dwelling- white asbestos shingle 2 story. 4 persons. Kitchen waste erupting from grease trap drainline onto ground surface next to house. Sanitary Notice issued 8-30-01 to field #608.

CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes)

CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes) -Dwelling- gray frame and vinyl siding. 1 story with white trim. 2 persons. Laundry wastes discharge through a 2" white PVC pipe onto ground surface. Sanitary Notice issued 8-27-01 to field #557.

#### 24. CONTRIBUTES POLLUTION -

Dwelling- cream house trailer with blue trim and shutters. No contact. Effluent erupting from drainfield onto ground surface. Sanitary Notice issued 8-27-01 to field #550.

# 27. CONTRIBUTES POLLUTION, *DIRECT* -

. Dwelling

white asbestos shingle 2 story with green shutters. No contact. Effluent erupting from drainfield onto ground surface 50' from the Coan River at 5' elevation. Sanitary Notice issued 8-16-01 to field #432.

#### 29. CONTRIBUTES POLLUTION -

. No contact. Effluent erupting from

septic tank onto ground surface. Sanitary Notice issued 7-25-01 to field #390.

#### 30. CONTRIBUTES POLLUTION -

. Dwelling- gray frame 1 story

with brown trim and red shutters. No contact. The 4" white PVC sewer pipe from house to septic tank is broken. Sanitary Notice issued 7-24-01 to field #382.

#### 31. CONTRIBUTES POLLUTION

Dwelling- brick 1 story with white

trim. No contact. Effluent erupting from septic tank onto ground surface. Sanitary Notice issued 7-19-01 to field #285.

## 33. CONTRIBUTES POLLUTION (Kitchen or Laundry Wastes)

. Dwelling- white cement block 1 story with black shutters. 2 persons. Effluent erupting from grease trap onto ground surface. Sanitary Notice issued 7-17-01 to field #249.

#### 35. CONTRIBUTES POLLUTION -

Dwelling- white frame 2 story. 1 person. Effluent erupting from septic tank onto ground surface. Sanitary Notice issued 7-10-01 to field #351.

#### 37. CONTRIBUTES POLLUTION -

Dwelling- white cement block 1 story. 1 person. Indoor bathtub drains through a 3" white PVC pipe onto ground surface. Sanitary Notice

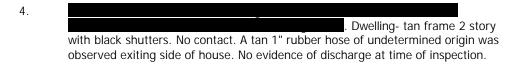
issued 6-19-01 to field #114.

#### 41. CONTRIBUTES POLLUTION -

. Dwelling- white

frame 2 story with green shutters. 3 persons, Effluent erupting from septic tank and distribution box onto ground surface. Sanitary Notice issued 6-10-01 to field #67.

#### POTENTIAL POLLUTION



AA.

Dwelling- white vinyl siding 2 story lighthouse cottage. No contact. Owner appears to have installed another drainline to the existing drainfield without a local health department permit. The drainline ends near the edge of the front yard ditch. No evidence of discharge at time of inspection.

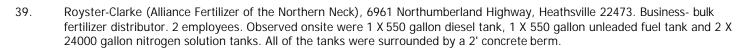
# SECTION C: NON-SEWAGE POLLUTION SOURCES INDUSTRIAL WASTES

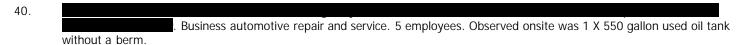
- 7. Commercial marina. 4 employees. Observed onsite were 1 X 1000 gallon diesel fuel tank, 1 X 1000 gallon and 1 X 2000 gallon unleaded fuel. tanks and 1 X 275 gallon kerosene tank inside a concrete berm. The berm has gate valves at the bottom to let out any rainwater that accumulates on the inside. Also observed onsite were 1.X 300 gallon used oil tank, 1 X 55 gallon used antifreeze tank and 8 batteries on a pallet. All of the items mentioned above were situated on a concrete pad.
- DIRECT Business- shellfish shucker packer (VA-671 SP). 6 employees.

  Processing wastes discharge into the Coan River. Currently operating under permit #VAG524037 from the Department of Environmental Quality, Water Regional Office.
- 26.

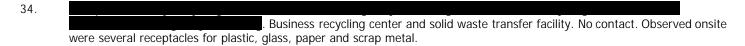
  Business- commercial marina. 2 employees. Observed onsite was 1 X 1000 gallon unleaded fuel tank with a concrete berm.
- 28. DIRECT 
  1. Business- shellfish shucker packer (VA-90SP). 40 employees. Processing and washdown wastes discharge into the Coan River. The cannery liquid, wastes drain into septic tanks and are pumped into a spray irrigation system with a permitted discharge of .0220 MGD. Currently operating under permit #VAG524048 from the Department of Environmental Quality, Water Regional Office. Also observed onsite were 1 X 1000 gallon unleaded fuel tank, 1 X 1000 gallon #2 diesel fuel tank (both without berms) and 1 X 12000 gallon #4 fuel oil tank inside a concrete berm.
- 32.

  Business- automotive repair. 2 employees. Observed onsite were 1 X 550 gallon used oil tank and 3 X 55 gallon drums that were used for oil and other fluids. The tank and the drums were not enclosed inside a berm.





#### SOLID WASTE DUMPSITES



#### **SECTION D: BOATING ACTIVITY**

#### **MARINAS**

- dry storage spaces available. Present at time of survey were 4 pleasure boats under 26' and 14 pleasure boats over 26'; and in dry storage there were 19 pleasure boats under 26' and 2 pleasure boats over 26'. Boating services provided are fuel, water, electricity, an in-out ramp and repair. Containers are available for solid waste collection. Sanitary facilities provided are 1 commode, 1 lavatory and 1 shower for men; and 1 commode, 1 lavatory and 1 shower for women. Sewage disposal is by a septic tank with drainfield, which appeared to be in satisfactory condition at time of inspection. Portable toilet dump station facilities and boat holding tank pump-out facilities are provided at this location.
- 1 1. No contact. 34 slips/moorings available. Present at time of survey were 2 work boats and 9 pleasure boats under 26' and 1 work boat and 1 pleasure boat over 26'. Boating services provided are electricity, water and an in-out ramp. Containers are available for solid waste collection. Sanitary facilities provided are 1 vault privy for men and women. Sewage disposal is by pump and haul. The vault privy is used as a portable toilet dump station facility. Owner has an exemption to the requirement to provide boat holding tank pump-out facilities at this location.

26.

28.

Business- shellfish shucker packer. 6 employees. 20 slips available. Present at time of survey were 8 work boats under 26'. The only boating service provided is electricity. There are containers available for solid waste collection. Sanitary facilities provided are 1 commode and 1 lavatory for men and 3 commodes and 1 lavatory for women. Sewage disposal is to a septic tank with drainfield, which appeared to be in satisfactory condition at time of inspection. Portable toilet dump station facilities are provided. Owner has an exemption to the requirement to provide boat holding tank pump-out facilities at this location.

Commercial marina. 2 employees. 63 slips/19 dry storage spaces available. Present at time of survey were 4 work boat and 6 pleasure boats under 26' and 3 work boats and 34 pleasure boats over 26'; and in dry storage there were 7 pleasure boats under 26' and 22 pleasure boats over 26'. Boating services provided are fuel, in-out ramp, electricity, repair and water. There are containers available for solid waste collection. Sanitary facilities provided are 2 commodes, 2 lavatories and 1 shower for men; and 2 commodes, 2 lavatories and 1 shower for women. Sewage disposal is to a septic tank with drainfield, which appeared to be in satisfactory condition at time of inspection. Portable toilet dump station facilities and boat,holding tank pump-out facilities are provided at this location.

#### OTHER PLACES WHERE BOATS ARE MOORED

- 8. Private repair yard. 1 person. 3 slips/moorings available. There were no boats present at time of survey. Boating services provided are electricity and repair. There are no containers available for solid waste collection. The only sanitary facilities provided are 1 pit privy. The privy is used as a portable toilet dump station facility. Owner has an exemption to the requirement to provide boat holding tank pump-out facilities at this location.
- 10. Private pier. 1 person. 6 slips/moorings available. Present at time of survey were 3 work boats over 26'. There are no boating services or containers for solid waste collection provided. Sanitary facilities provided are 1 unisex commode and lavatory in shed. Sewage disposal is by a septic tank with drainfield, which appeared to be in satisfactory condition at time of inspection. The are no boat holding tank pump-out or portable toilet dump station facilities available at this location.
- were 4 work boats under 26'. There are no boating services provided at this location. Containers are available for solid waste collection. Sanitary facilities provided are 4 commodes, 3 lavatories and 3 urinals for men; and 5 commodes and 3 lavatories for women. Sewage disposal is to a septic tank with drainfield which appeared to be in satisfactory condition at time of inspection. Portable toilet dump station facilities are available. There are no boat holding tank pump-out facilities at this location.

#### **UNDER SURVEILLANCE**

. Public pier and boat ramp. No contact. 2 moorings available. There were no boats present at time of survey. Containers am available for solid waste collection. The only boating service provided is an in-out ramp. There are no sanitary facilities, portable toilet dump station facilities or boat holding tank pump-out facilities provided at this location.

#### SECTION E: CONTRIBUTES ANIMAL POLLUTION

- Dwelling- white frame 1 story with green shutters. 2 persons. Present at time of survey were 45 domestic fowl in 3 separate pens. Waste is left on the ground.
- Dwelling- white frame 2 story with green shutters and roof. 1 person. Present at time of survey were 30 cows in a fenced pasture and 25 chickens in a coop. Manure is left on the ground.
- 42. Dwelling brick 2 story with white trim and black shutters. 2 persons. Present at time of survey were 30 cows and 5 horses in a fenced pasture 100 yards from an unnamed tributary of the Coan River. Manure is left on the ground.

#### **SUMMARY**

Area #8

Coan River: The Glebe and Kingscote Creek

Date: September 14, 2001

#### **SECTION B: SEWAGE POLLUTION SOURCES**

#### 1. SEWAGE TREATMENT WORKS

- 0 DIRECT None
- Q -INDIRECT None
- 0 B.1. TOTAL

#### 2. ONSITE SEWAGE DEFICIENCIES

- 1 CONTRIBUTES POLLUTION, DIRECT #27
- 13 CONTRIBUTES POLLUTION, INDIRECT #5, 9, 12, 14, 18, 19, 24, 29, 30, 31, 35, 37, 41
  - 1 CP (Kitchen or Laundry Wastes), DIRECT #15
- 9 CP (Kitchen or Laundry Wastes), INDIRECT #1, 2, 3, 6, 13, 20, 21, 23, 33
- 0 NO FACILITIES, DIRECT None
- .2 NO FACILITIES, INDIRECT #16, 17
- 26 B.2.TOTAL

#### 3. POTENTIAL POLLUTION 2 - POTENTIAL POLLUTION - #4, 4A

SECTION C:

#### NON-SEWAGE WASTE SITES 1. INDUSTRIAL WASTE SITES

2 - DIRECT - #25,

28 ~ - INDIRECT - #7, 26, 32, 39, 40 7 - C.1. TOTAL

#### 2. SOLID WASTE DUMPSITES

0 - DIRECT - None 1 - INDIRECT - #34 1 - C.2. TOTAL

# **SECTION D: BOATING ACTIVITY**

- 4 MARINAS #7, 11, 25, 26
- 3 OTHER PLACES WHERE BOATS ARE MOORED #8, 10, 28
- 1 UNDER SURVEILLANCE #38
- 8 D. TOTAL

#### **SECTION E: CONTRIBUTES ANIMAL POLLUTION**

- 0 DIRECT None
- -3 -INDIRECT #22, 36, 42
- 3 E. TOTAL

# **APPENDIX A Item 2**

# NOTICE AND DESCRIPTION OF SHELLFISH AREA CONDEMNATION NUMBER 145, COAN RIVER AND, THE GLEBE



# COMMONWEALTH of VIRGINIA

RANDOLPH L. GORDON, M.D., M.P.H. COMMISSIONER Department of Health
P O BOX 2448
RICHMOND, VA 23218

TDD 1-800-828-1120

# NOTICE AND DESCRIPTION OF SHELLFISH AREA CONDEMNATION NUMBER 145, COAN RIVER AND, THE GLEBE

#### **EFFECTIVE 25 FEBRUARY 1997**

Pursuant to Title 28.2, Chapter 8, §§28.2-803 through 28.2-808, §32.1-20, and §9-6.14:4.1, B.16 of the *Code of Virginia:* 

- 1. The "Notice and Description of Shellfish Area Condemnation Number 145; Coan River and The Glebe," effective 5 March 1996, is canceled effective 25 February 1997.
- 2. Condemned Shellfish Area Number 145, Coan River and The Glebe, is established, effective 25 February 1997. It shall be unlawful for any person, firm, or corporation to take shellfish from area # 145 for any purpose, except by permit granted by the Marine Resources Commission, as provided in Section 28.2-810 of the *Code of Virginia*. The boundaries of the area are shown on map titled "Coan River & The Glebe, Condemned Shellfish Growing Area # 145, 25 February 1997" which is part of this notice.
- 3. The Department of Health will receive, consider and respond to petitions by any interested person at any time with respect to reconsideration or revision of this order.

#### **BOUNDARIES OF CONDEMNED AREA NUMBER 145**

- A. The condemned area shall include all of Kingscote Creek and its tributaries lying upstream of a line drawn due east from Marine Resources Commission survey marker "Grain" to the opposite shore.
- B. The condemned area shall include all of The Glebe and its tributaries lying upstream of a line drawn due east from Marine Resources. Commission survey marker "Wheat" to the opposite shore.
- C. The condemned area shall include all of Wrights Cove and its tributaries lying upstream of a line drawn from Marine Resources Commission survey marker "B" due northeast to the opposite shore.

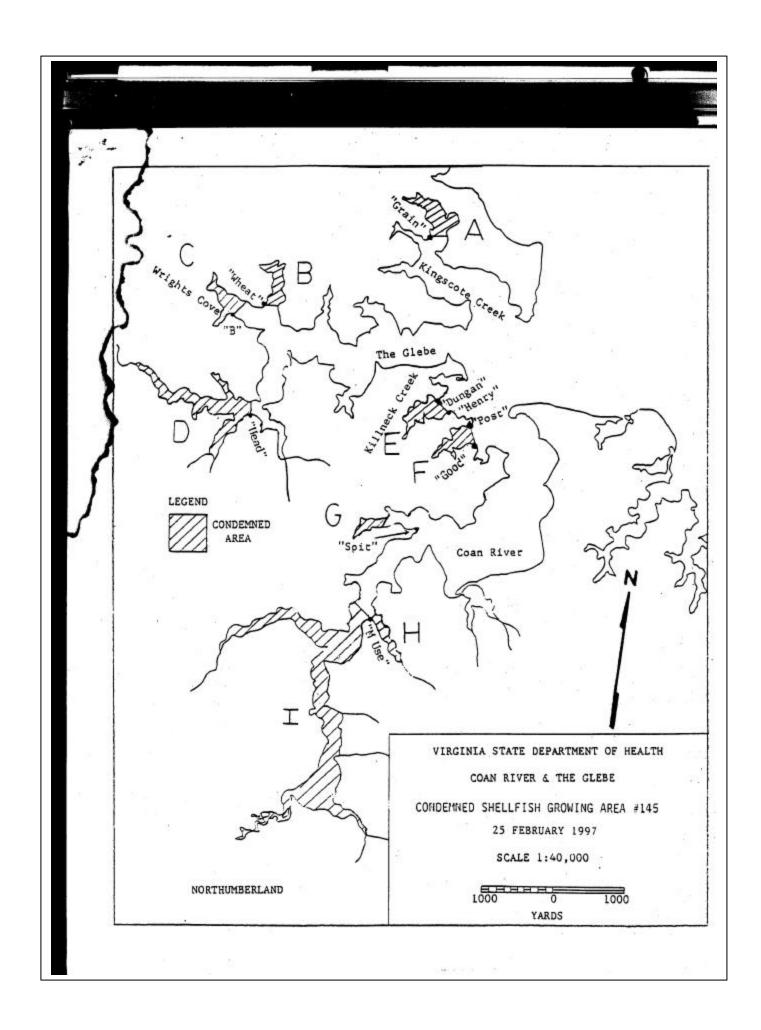


# Shellfish Area Condemnation Number 145 Page Two

- D. The condemned area shall include all of Glebe Creek and its tributaries lying upstream of a line drawn from Marine Resources Commission survey marker "Head" due north to the opposite shore.
- E. The condemned area shall include all of Killneck Creek and its tributaries lying upstream of a line drawn between Marine Resources Commission survey markers "Dungan" and "Henry."
- F. The condemned area shall include all of that portion of the Coan River and its tributaries lying upstream of a line drawn from Marine Resources Commission survey marker'. Post" on the north shore to survey marker "Good" on the south shore.
- G. The condemned area shall include all of that portion of the Coan River and its tributaries ' lying upstream of a line drawn from a point 450 yards upstream of Marine Resources Commission survey marker "Spit" for approximately 140 yards to the easternmost projection of the prominent point of land on the opposite shore.
- H. The condemned area shall include all of that portion of the Coan River and its tributaries lying upstream of a line drawn from Marine Resources Commission survey marker "M Use" northeasterly to the southwesternmost projection of the prominent point of land on the opposite shore.
- 1. The condemned area shall include all of that portion of the Coan River and its tributaries lying upstream of a line drawn from Marine Resources Commission survey marker "M Use" due northwest to the opposite shore.

Recommended by:

Director, Division of Shellfish Sanitation ion



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# Appendix B

- 1) Non-point Sources of Fecal Contamination in the Coan River and Little Wicomico River Watersheds
- 2) Non-point Sources of Fecal Contamination in the Coan River and Little Wicomico River Watersheds Addendum to Final Report presented to the Virginia Department of Environmental Quality

# Non-point Sources of Fecal Contamination in the Coan River and Little Wicomico River Watersheds Final Report presented to The Virginia Department of Environmental Quality

Charles Hagedorn, Professor and Cheryl Szeles, Graduate Research Assistant

Department of Crop and Soil Environmental Sciences Virginia Polytechnic Institute and State University Blacksburg, VA 24061-0404

**January 28, 2003** 

# 1. Summary

Sources of fecal contamination were determined for the Coan River and Little Wicomico River Watersheds using the antibiotic resistance analysis (ARA) procedure. ARA is a bacterial source tracking (BST) method that involves development of a known source library (*Escherichia coli* or *E. coli* for this project) and then classifying *E. coli* isolates from water (unknown sources) to determine their origin. The identification of sources is accomplished by using the statistical method of logistic regression analysis to classify each isolate recovered from water samples by comparing its ARA patterns with the ARA patterns of isolates in the known source library.

For ARA, 1,248 *E. coli* isolates were collected from known sources in the two watersheds and included birds (shorebirds and waterfowl), humans, livestock (cattle and horses), pets (dogs), and wildlife (deer, raccoon, muskrat). The rates of correct classification (RCC) ranged from 84.7% for birds to 62.1% for dogs, and the average rate of correct classification (ARCC) for the entire library was 71.9%.

Water samples were collected monthly at stations along the Coan River (108 samples from nine stations) and Little Wicomico River (72 samples from six stations) over a 12-month period from September 2001 through August 2002 (collections made by employees of the Virginia Department of Health, Division of Shellfish Sanitation, VDH-DSS). *Escherichia coli* populations were measured to evaluate the quantity of fecal material in the water (by Dr. Howard Kator, VIMS), and the *E. coli* isolates from the bacterial enumerations were then profiled by ARA (24 isolates per sample) to determine origin. Monitoring results indicated that 42.2% of the samples from both rivers exceeded the Virginia shellfish standard for fecal pollution. Source tracking results demonstrated that human-derived pollution was pervasive and dominant in both rivers, followed by birds as the major sources that contributed to fecal pollution in the Coan and Little Wicomico watersheds. Wildlife, pets, and livestock were minor contributors in comparison to humans and birds.

#### 2. Introduction

Methods to identify sources of fecal pollution are important because fecal contamination of water is still a widespread problem in the United States (U.S. EPA 1986 and 1997). In Virginia, roughly one third of over 78,000 km of streams and rivers have been adequately monitored, and to date 3,486 km of streams and 253 km² of estuaries (of those monitored) are listed as impaired (Friends of the Rivers of Virginia, 2001; Virginia Department of Environmental Quality 2001). The leading cause of impairments (over 60%) is violation of the fecal coliform standard, and non-point agriculture is the most widely suspected (but unproven) source. The situation in Virginia where large numbers of impairments are due to fecal pollution is typical of many states (U.S. EPA 1999a and 1999b).

There have been numerous recent reports on methodologies that have the potential to differentiate between human and non-human sources of fecal pollution in water. These methodologies include antibiotic resistance analysis or ARA (Bower 2001; Harwood et al. 2000; Wiggins 1996; Wiggins et al. 1999), multiple antibiotic resistance profiles (Parveen et al. 1997), ribotyping (Carson et al. 2001; Hartel et al. 1999; Parveen et al. 1999), pulsed-field gel electrophoresis (Simmons et al. 1995; Simmons and Herbein 1998), ribosomal genetic markers in Bacteroides-Prevotella (Bernhard and Field 2000a and 2000b), repetitive DNA sequences (Dombeck et al. 2000), source-specific phages (Hsu et al. 1995), and sorbitol-fermenting bifidiobacteria (Rhodes and Kator 1999). While none of these methods are entirely new, their use in identifying sources of fecal pollution in water represents a novel application (Hagedorn et al. 1999). None of these methods have yet emerged as the best ones, and there is a clear lack of comparative multi-year studies to determine the relative strengths and weaknesses of each (although three such studies are now in progress).

The Total Maximum Daily Load (TMDL) program (section 303, the Clean Water Act, U.S. EPA 1986) requires the establishment of source load allocations and inclusion of seasonal variation in determining allowable pollution loads (McKenzie 1998; McClellan et al. 2000). Accurate identification of sources of fecal pollution for load allocations during studies that include seasonal variation will require source classification of substantial numbers of isolates over multi-month time frames to determine proportionality of sources. Fecal contamination in natural waterways can lead to several problems, including higher incidences of pathogens (Sinton et al. 1993), and increased nutrient levels that lead to algal blooms and deoxygenation of waterways (as is currently the case in the Chesapeake Bay, Alliance for Chesapeake Bay, 1993). Fecal contamination in waterways has consistently been demonstrated by the presence of indicator organisms such as fecal coliforms or enterococci. However, differentiation of the sources of fecal contamination in waters receiving mixed agricultural and human waste is more difficult. Knowledge of the source of fecal contamination is important because humans are more susceptible to infections by pathogens found in human feces (Sinton et al. 1993). Once the source is identified, steps can be taken to control the influx of fecal pollution.

Antibiotic resistant bacteria can develop in animals and humans as a result of treatment with antibiotics. This is the basic premise of antibiotic resistance analysis (ARA), which uses enterococci and *E. coli* as indicator organisms in identification of sources of fecal contamination (Wiggins, 1996). *E. coli* is a species of gram-negative, bacterial rods that ferment lactose and are able to grow at 44.5°C, and is used because it is the regulatory indicator organism for shellfish waters. In the ARA approach, strains of *E. coli* are isolated from known fecal sources and grown on plates containing various concentrations of different antibiotics. The resulting antibiotic resistance patterns of each isolate are then analyzed using logistic regression analysis, a multivariate statistical method. The results are pooled to form a "known library" of antibiotic resistance patterns from different fecal sources. Resistance patterns of isolates from water samples are then compared with this known library to determine the source(s) of fecal pollution in that waterway (Graves *et al.* 2002; Wiggins *et al.* 1999).

In this report, ARA and *E. coli* counts were used to draw conclusions about the source(s) of fecal contamination in the watersheds of the Coan and Little Wicomico Rivers. Both rivers are located in Virginia's Northern Neck, Northumberland County. The Coan River empties into the lower Potomac River and the Little Wicomico enters into the Chesapeake Bay at Smith Point, where the Potomac River and Chesapeake Bay converge. Both rivers are polluted with fecal matter, and contain shellfish beds that have been closed because of high levels of fecal coliforms. Based on sanitary surveys, the major potential sources of fecal contamination in the two watersheds that needed to be included in the known source library were birds, humans, livestock, pets and wildlife sources.

# 3. Materials and Methods

# A. Sample Collection:

Fecal and water samples were collected by VDH-DSS personnel as part of their regular monitoring program. Additional fecal samples were also collected by Howard Kator (VIMS), Charles Hagedorn, and Cheryl Szeles (VT) during the course of numerous trips to the watersheds. All fecal samples and water samples were delivered to Howard Kator's laboratory at VIMS within 6 hours of collection. The samples were filtered, and the numbers of *E. coli* present was determined using modified m-TEC agar. Filter plates were then shipped to VPI by overnight delivery. Nine sites were sampled in the Coan River watershed (Figure 1), and 6 sites were sampled in the Little Wicomico River watershed (Figure 2) over a 12-month period from September 2001 through August 2002. The goal was to test 24 isolates from each sample, resulting in a confidence level of 95%. Because of low counts, fewer than 24 isolates were analyzed for some samples. To determine the effects of overnight storage on classification, duplicate sets of water samples were collected from the Coan River stations in July and August. One set was filtered within 6 hours, and the other set was refrigerated overnight before filtering (24 hr).

#### B. Isolation of *E. coli*:

Isolated colonies were selected (24 for unknown samples, and 10-12 for known samples) and transferred to 96-microwell plates containing 0.2 ml of Colilert broth. The microwell plates were incubated at 37°C for 24 hours. MUG-negative isolates (no fluorescence under ultraviolet light) were not analyzed (Whitlock *et al.* 2002).

#### C. Antibiotics:

Isolates from the 96-microwell plate were transferred to antibiotic-containing Trypticase Soy agar (TSA) plates using a sterile 48-prong replica-plater. Various concentrations of 7 antibiotics were used (28 concentrations total, Graves *et al.* 2002). The isolates were also replica-plated to two TSA plates that did not contain antibiotics as controls. All TSA plates were incubated at 37°C for 24-48 hours. After incubation, the growth of each isolate on each concentration of each antibiotic was determined by comparison to the control plates, and the resulting antibiotic resistance patterns were entered into an Excel spreadsheet ("1" equaling growth and "0" equaling no growth).

# D. Statistical Analysis:

The results from resistance testing of the known isolates were entered into the SAS statistical program (JMP Statistical Software, ver. 5.0) where they were analyzed by Logistic Regression using the NOMINAL LOGISTIC procedure, which produces a classification table. The average rate of correct classification (ARCC) is the average rate that known isolates were correctly classified, and was determined by averaging the percentages of correctly classified isolates for each source. For this analysis, all resistance patterns from known sources were kept in the library. The isolates from each water sample were then classified using this library. Logistic Regression identifies the most likely source for each isolate and displays the probability that each isolate belongs to the source that it is classified as.

When multiple regression methods are used to analyze relatively small data sets, random groupings (artificial clustering) based on stochastic processes rather than true relationships can occur. Such artificial classification limits the usefulness of small libraries, and should not exceed the purely random distribution of 20% for the five source categories used in this project. One way to ensure that a library is large enough to avoid this random grouping phenomenon is to randomly assign the isolates to source categories as the library is being constructed. When analysis of the library is carried out, the ARCC for the randomly assigned data set should approximate the probability that an isolate would be assigned to a source category by chance. Whitlock *et al.* (2002) reported ARCCs of 27.9% and 28.9% for two randomly generated data sets and, with four source categories, the probability that any one isolate would be assigned to one of the categories by chance was 25%. The low random ARCCs demonstrated that negligible random groupings occurred when analysis was performed on the relatively large library (2,398 isolates) used in their study.

To measure the representativeness of the library (i.e., how well it represents the diversity of patterns present in the sources in the watershed), all of the isolates from each known sample were successively removed from the library, and then classified based on the library containing the remaining isolates. The ARCC of these removed isolates was then calculated. This "jackknife" method estimates how well "new" isolates would be classified by the library. If there is a large difference between the ARCCs of these two methods, it suggests that the library is not representative of the sources in the watershed. The Minimum Detectable Percentage (MDP) for this library was calculated by determining the mean of the expected frequencies of misclassification (the average percentages of other source types that were misclassified as that type) and adding the value of 4 times the standard deviation of the mean (Whitlock *et al.* 2002). This value is a conservative estimate of the minimum percentage of a source that can be detected in a water sample. Thus, if a source is found at levels above the MDP, it can be reasonably assumed that this is not the result of misclassification of other sources, and therefore is present in the watershed.

#### 4. Results

# A. Classification of Known Isolates (Library Composition).

A total of 1,248 isolates were tested from the five sources and the isolates collected from these known fecal sources were analyzed using Logistic Regression (Table 1).

Table 1. Classification of 1,248 isolates of *E. coli* from known sources collected in the Coan River and Little Wicomico River watersheds. Correctly classified isolates (%) are shown in bold and the ARCC for the library was 71.9%. Each grid contains the number of isolates (top number) and the % classified (lower number).

Source	Bird	Human	Livestock	Pets	Wildlife	Totals
Bird	305	24	22	3	34	388
	84.72	7.38	9.21	2.78	15.74	
Human	24	243	29	31	19	346
	6.67	74.77	12.13	28.70	8.80	
Livestock	8	27	173	4	11	223
	2.22	8.31	72.38	3.70	5.09	
Pets	0	9	3	67	10	89
	0.00	2.77	1.26	62.04	4.63	
Wildlife	23	22	12	3	142	202
	6.39	6.77	5.02	2.78	65.74	
Totals	360	325	239	108	216	1248

One hundred and forty known source samples were collected during the course of the project: 42 bird scat samples (shore birds and waterfowl) yielded 360 isolates, 36 human samples (from septic tank pump-out trucks and single dwelling septic tanks) provided 325 isolates, 25 cattle and horse scat samples provided 239 isolates, 14 dog scat samples yielded 108 isolates, and 23 wildlife scat samples (deer, raccoon, muskrat) provided 216 isolates. The average rate of correct classification (ARCC) of the library was 71.9%, which was well above the background random classification level of 20% (based on 5 sources). The rates of correct classification (RCC) were 84.7% for birds, 74.8% for human, 72.4% for livestock, 62.1% for dogs, and 65.7% for wildlife (Table 1).

When the library was classified using a two-way split of human vs. non-human, the ARCC was 80.2% (68.3% RCC for human and 92% RCC for non-human). When the library was classified using a four-way split (combining birds with wildlife), the ARCC was 76.3% (71.0% RCC for human, 76.5% RCC for livestock, 76.8% for pets, and 81.2% RCC for wildlife + birds). The highest RCC for the human category (74.8%) was obtained with the five-way split (Table 1), and this was the reason that the five-way split was then used to classify *E. coli* isolates from water samples.

When the library was analyzed for artificial clustering, the ARCC was 24.8%, only 4.8% higher than random distribution of 20%, indicating that the library was of sufficient size to be used to classify unknown source isolates from water samples (Table 2). The random classifications (artificial clustering) were 22.2% for birds, 24.8% for human, 18.4% for livestock, 28.1% for dogs, and 29.6% for wildlife (Table 2). The largest artificial clusters were obtained with pets and wildlife, and indicated that these would be the sources where more isolates were needed if the library was to be expanded.

Table 2. Classification of 1,248 isolates of *E. coli* randomly assigned to source Categories. Artificial classifications (%) are shown in bold and the ARCC for the library was 24.8%. Each grid contains the

number of isolates (top number) and the % classified (lower number).

Source	Birds	Human	Livestock	Pets	Wildlife	Totals
Birds	57	52	41	42	38	230
	22.89	20.80	16.40	16.87	15.20	
Human	51	62	49	42	51	255
	20.48	24.80	19.60	16.87	20.40	
Livestock	30	35	46	46	40	197
	12.05	14.00	18.40	18.47	16.00	
Pets	48	51	59	70	47	275
	19.28	20.40	23.60	28.11	18.80	
Wildlife	63	50	55	49	74	291
	25.30	20.00	22.00	19.68	29.60	
Totals	249	250	250	249	250	1248

The library contained 565 duplicate isolates and 683 unique patterns. When the unique patterns were analyzed using jackknife analysis of individual isolates (performed by Dr. Bruce Wiggins, JMU), the ARCC was 72% (the ARCC of the library was 71.9%, Table 1). This equivalence in classification success indicates that this known source library is representative of the two watersheds. When the library was analyzed using jackknife analysis of individual samples instead of isolates, the ARCC was 64%, only 7.9% lower than the ARCC of 71.9% for the library (also demonstrating equivalence in classification success). Based on the jackknife analysis, the Minimum Detectable Percentage (MDP) for the Coan and Little Wicomico library was calculated. The mean expected frequency of misclassification (EFM) of this library is 6% ± 3% SD. Multiplying the SD of 3 by four (equals 12) and adding this to the mean EFM (6%) results in a MDP of 18%. Multiplying the SD by three results in a level of confidence at the 99.9% level, so four is used as an additional measure to obtain a conservative estimate. The MDP, as proposed by Whitlock et al. (2000), reflects the amount of misclassification that occurs for a particular library, and is a conservative estimate of the lower limit for considering a source to be a significant contributor to a watershed.

# B. Analysis of Coan River Samples:

- **1.** *E. coli* enumerations. During the study period, 108 samples were collected from 9 sampling stations on the Coan River. The numbers of *E. coli* in these samples, and the total amount of rainfall in the 3 days previous to the sampling are shown in Table 3, listed by sample site and collection date. Forty-six of the samples (42.6%) had levels of *E. coli* that were above the Virginia standard of 14 *E. coli* /100 ml. Five of the nine stations (C-16, C-20, C-27, C-37.5Z, C-38) had consistently high fecal counts, with the geometric mean of the 12 monthly samples exceeding the Virginia standard. Over the nine stations, the months with the highest fecal counts were the April, August, September, and November samples. There appeared to be no correlation with rainfall in the fecal counts, as the April sample had only 0.01 inch and the November sample had none in the preceding three days, while the August sample had 0.62 inch and the September sample had 1.0 inch in the preceding 3 days.
- **2. Classification with ARA**. Based on the Coan and Wicomico known source library, the 108 samples were classified by source. The results are shown in Table 4, listed by sample site and collection date. There was a strong human signature at all nine sampling stations and the percent of isolates classified as human averaged, over 12

months, above 50% for all stations except C-24 (46.5%). The 12-month averages for the percent human signature were 81.6% for C-7, 74.7% for C-15, 63.2% for C-20, and ranged from 52.1% to 59.0% for the remaining five stations (Table 4). When comparing the five known source categories, human and bird sources were the most common with 95 and 33, respectively, of the 108 samples having percentages that exceeded the Minimum Detectable Percentage (MDP) of 18%. Livestock, pets, and wildlife signatures exceeded the MDP 15, 4, and 12 times, respectively, and are minor contributors to pollution in the Coan River compared to humans and birds.

There was very little seasonality in the results when comparing the wet and dry season averages for the human signature (Table 4). The human signature was higher in the wet season than the dry season for five of the stations, but the percent human isolates (averaged over all stations) for the wet season (69.0%) and the dry season (57.7%) were fairly close (and well above the MDP of 18%). For the 95 samples where the human signature exceeded the MDP, it was dominant in 70 of them, and was dominant in 12/12 samples for C-7 and 10/12 samples for C-15. On a per station basis. the 12-month average human signature exceeded the MDP at all 9 stations. Bird isolates were higher in the dry season than during the wet season for eight of the nine stations, but the seasonal averages over the year were 5.4% for the wet season and 16.6% for the dry season (both below the MDP of 18%). The seasonal average bird signature exceeded the MDP at four stations during the dry season (C-16, C-20, C-24, and C-27) and did not exceed the MDP at any stations during the wet season. On a per station basis, the 12-month average bird signature exceeded the MDP at 5 of the 9 stations (C-16, C-20, C-24, C-27, and C-37.5Z). The bird signature exceeded the MDP 33 times and in 15 of these samples the bird signature was dominant (for example, 91.7% for May at C-16), and the high bird signatures were concentrated in the months of May, June, August, September, November, and December.

As with birds, the dry and wet season annual averages for livestock, pets, and wildlife were all below the MDP of 18% (Table 4). The pet signature did not exceed the MDP for any season at any site while the wildlife signature was barely above the MDP during the wet season at stations C-16 and C-20 (18.1% for both) and during the dry season at station C-37.5Z (29.2%). The pet signature exceeded the MDP just four times and was only dominant once (62.5% for June at C-16). There were twelve samples where wildlife exceeded the MDP, and only three samples where the wildlife signature was dominant (54.2% for March at C-16, 45.8% for December at C-38, and 41.7% for July at C-37.5Z). The livestock signature did not exceed the MDP at any station during the wet season, but exceeded the MDP during the dry season at six stations (C-15, C-16, C-24, C-27, C-33, and C-37.5Z), but was the dominant signature just five times.

In summary, the human signature was predominant and was slightly higher in the wet season than the dry season. Birds were second in importance to humans, and both birds and livestock were both more abundant in the dry season than the wet season, while the pets and wildlife signatures were essentially negligible. Averaging the percent classifications over all sources and samples provides an obvious ranking of the five sources: humans (61%), birds (17%), livestock (8%), wildlife (7%), and pets (3.0%).

**3. Comparison of 6-hour and 24-hour samples.** The July and August Coan River samples that were held overnight before processing were analyzed and compared to the 6-hour samples (Table 4A). For the monitoring results, there was excellent agreement between the July (p=.99) and August (p=.45) 6 and 24 hr samples. For source tracking results, the source averages differed from each other by no more than 11% (well below the MDP). These results indicate that were no major differences between samples held for six versus 24 hours.

## C. Analysis of Little Wicomico River Samples:

- **i.** *E. coli* **enumerations.** During the study period, 72 samples were collected from 6 sampling stations on the Little Wicomico River. The numbers of *E. coli* in these samples, and the total amount of rainfall in the 3 days previous to the sampling are shown in Table 5, listed by sample site and collection date. Thirty of the samples (41.7%) had levels of *E. coli* that were above the Virginia standard of 14 *E. coli* /100 ml. Three of the six stations (W-16, W-19, and W-20) had consistently high fecal counts, with the geometric mean of the 12 monthly samples exceeding the Virginia standard. Over the six stations, the months with the highest fecal counts were the March, April, and September samples. There appeared to be no correlation with rainfall in the fecal counts, as the March sample had 0.70 inch of rain, the April sample had only 0.12 inch, and the September sample had 1.45 inch in the preceding three days.
- ii. Classification with ARA. Based on the Coan and Wicomico known source library, the 72 samples were classified by source. The results are shown in Table 6, listed by sample site and collection date. There was a strong human signature at all six sampling stations and the average percent of isolates classified as human, over 12 months, ranged from 42.0% (W-20) to 61.8% (W-9X). When comparing the five known source categories, human and bird sources were the most common with 64 and 30, respectively, of the 72 samples having percentages that exceeded the Minimum Detectable Percentage (MDP) of 18%. Livestock, pets, and wildlife signatures exceeded the MDP 11, 5, and 18 times, respectively, and are minor contributors to pollution in the Little Wicomico River compared to humans and birds.

There was very little seasonality in the results when comparing the wet and dry season averages for the human signature (Table 6). The human signature was higher in the wet season than the dry season for five of the stations, but the percent human isolates (averaged over all stations) for the wet season (61.6%) and the dry season (53.9%) were fairly close (and well above the MDP of 18%). For the 64 samples where the human signature exceeded the MDP, it was dominant in 46 of them, and was dominant in 11/12 samples for W-9X and 10/12 samples for W-9W. On a per station basis, the 12-month average human signature exceeded the MDP at all 6 stations. Bird isolates were also very similar for both the wet and dry seasons and the seasonal averages over the year were 16.9% for the wet season and 15.5% for the dry season (both below the MDP of 18%). The seasonal average bird signature exceeded the MDP at two stations during both the wet and dry seasons (W-13.5Z and W-20). On a per station basis, the 12-month average bird signature exceeded the MDP at all 4 of 6 stations. The bird signature exceeded the MDP for 30 samples and was dominant in 12 of those (for example, 100% for May at W-19) and the high bird signatures were concentrated in the months of April, May, June, August, November, December, and January.

As with birds, the dry and wet season annual averages for livestock, pets, and wildlife were all below the MDP of 18% (Table 6). The pet signature did not exceed the MDP for any season at any site while the wildlife signature was barely above the MDP during the wet season at stations W-9X and W-13.5Z (19.5% for both) and during the dry season at station W-20 (18.1%). The pet signature exceeded the MDP just five times and was only dominant twice (41.2% for December at W-9W and 58.3% for December at W-13.5Z). There were 18 samples where wildlife exceeded the MDP, and only three samples where the wildlife signature was dominant (62.5% for May at W-9W, and 37.5% for January and 50.0% for June at W-20). The livestock signature did not exceed the MDP at any station during the wet season, but exceeded the MDP during the dry season at two stations (W-13.5Z and W-16), but was the dominant signature just once (25.0% for December at W-20).

In summary, the results for the Little Wicomico River were similar to those for the Coan River in that the human signature was predominant and was slightly higher in the wet season than the dry season. The bird signature was spread more evenly over all the wet and dry seasons for the Little Wicomico samples and livestock was more abundant in the dry season than the wet season, although the livestock, pets, and wildlife signatures were essentially negligible. Averaging the percent classifications over all sources and samples provides an obvious ranking of the five sources: human (53%), birds (22%), wildlife (11%), livestock (8%), and pets (5%).

### 5. Discussion

These results clearly show that humans and birds are the major sources of pollution for both the Coan River and Little Wicomico River watersheds. All the sites had samples that contained percentages of both human and bird sources that were at or above the minimum detectable level. Combining the results of both rivers, humans accounted for 57.4% of the samples that were above the MDP while birds accounted for 22.7%. The contributions of wildlife, livestock, and pets were lower, at 10.8%, 9.3%, and 3.2%, respectively. This pattern of sources is consistent with the land use of these watersheds, which contain numerous marinas, older homes adjacent to waterfronts, areas of development, large but fluctuating bird populations, and substantial undeveloped areas. Comparing the Little Wicomico to the Coan River, the human signature was a smaller, and the bird and wildlife signatures were a larger (in the Little Wicomico), but the trends of a dominant human signature followed by birds in importance was the same.

Numerous trips around both watersheds and inspections of the rivers on boat trips with DSS personnel provided visual evidence that supports most of the results presented in this study. Such trips readily demonstrated the large populations of shorebirds and seasonal migrations of waterfowl that impact both watersheds. There is little evidence that pets or livestock would be a major contributor as dogs were rarely seen and livestock areas are well away from the sampling stations. The presence of a human signature was not a surprise due to the numbers of older homes adjacent to waterfront property in some parts of both watersheds, and the occurrence of a occasional pit privies located close to the water. However, the pervasive and large human signature over all sites was the major surprise of this study and indicates that substantial subsurface pollution for human sources is occurring (and must be widely distributed by tidal influences). The only other option is that the results, based on ARA, are not accurate. Currents and movement of water in both rivers due to rising and

falling tides are substantial and lend credence to the possibility that the human signature is being distributed and mixed throughout the river embayments from wherever the sources of human pollution might be.

**A. Limitations of this study**. There were no major limitations to this study although it is likely that there are additional patterns of potential sources not represented in the library. This concern is the same for all library-based methods and the two rivers were sufficiently close that one library could be made for both and the library passed the statistical tests that are used to determine the necessary size for a library and assessments of how representative it is. A moderately high threshold of 18% was set to ensure that chances of misidentification of sources was small. One limitation with a few samples is that only a small number of isolates were tested. Because of low fecal counts, some samples had very low isolate numbers, and the percentages that result from these low numbers are not precise (i.e., a given source in a sample with just 2 isolates can be only 0%, 50%, or 100%). Caution should be exercised in using the percentage values for these samples. One additional concern is the use of E. coli as the test organism. There is now some evidence from the source tracking community that E. coli may not be as effective as the enterococci for source tracking purposes, and there are questions about the genetic stability of *E. coli* that raise issues regarding the validity of results obtained with it. However, the ARCC obtained with the library in this study (71.9%) is in the upper range of those reported in the literature and is certainly high enough to be useful for watershed projects. Also, it should be possible to test some of the newer antibiotics that have only been approved for human therapy and see if these offer better distinctions between human and non-human sources of E. coli. Finally, it must be kept in mind that all BST methods, including ARA, are still being developed, and there are no "standard methods" vet for any BST procedure. There are many variables that determine the sources of fecal bacteria in water, and most of them are poorly understood.

# **6. Acknowledgments**

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Figure 1. Sampling stations in the Coan River watershed. Map courtesy of Howard Kator and Julie Herman from VIMS.

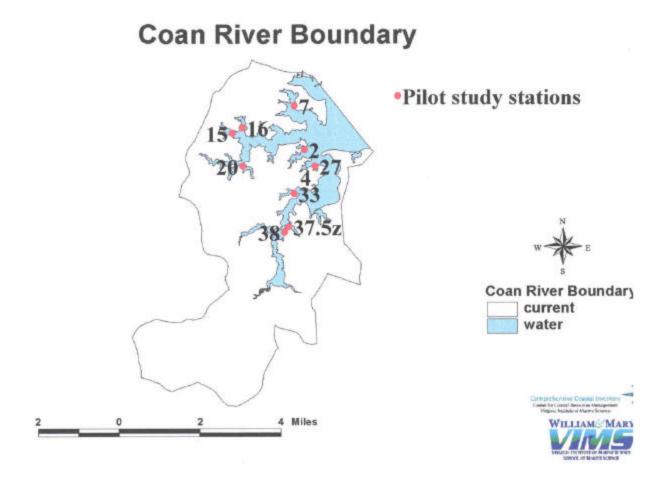
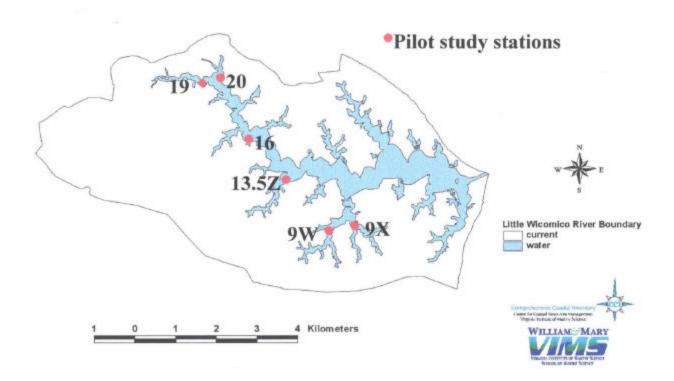


Figure 2. Sampling stations in the Little Wicomico River watershed. Map courtesy of Howard Kator and Julie Herman from VIMS.

# Little Wicomico River Boundary



**Table 3.** Numbers of *E coli* isolates in the Coan River watershed with rainfall 3 days prior to collection.

# A. Samples collected at DSS station C-7

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	C1	18	1.00
10/22/01	C10	4	0.00
11/19/01	C19	16	0.00
12/6/01	C28	5	0.02
1/17/02	C37	1	0.31
2/19/02	C46	0	0.00
3/20/02	C55	8	0.81
4/18/02	C64	9	0.01
5/1/02	C73	2	0.90
6/13/02	C82	1	0.00
7/15/02	C91	1	0.49
8/29/02	C100	10	0.62

# B. Samples collected at DSS station C-15

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	C1	13	1.00
10/22/01	C10	4	0.00
11/19/01	C19	4	0.00
12/6/01	C28	10	0.02
1/17/02	C37	2	0.31
2/19/02	C46	0	0.00
3/20/02	C55	15	0.81
4/18/02	C64	12	0.01
5/1/02	C73	1	0.90
6/13/02	C82	2	0.00
7/15/02	C91	3	0.49
8/29/02	C100	8	0.62

### C. Sample collected at DSS station C-16

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	C3	26	1.00
10/22/01	C12	12	0.00
11/19/01	C21	11	0.00
12/6/01	C30	16	0.02
1/17/02	C39	1	0.31
2/19/02	C48	1	0.00
3/20/02	C57	14	0.81
4/18/02	C66	48	0.01
5/1/02	C75	2	0.90
6/13/02	C84	18	0.00
7/15/02	C93	18	0.49
8/29/02	C102	26	0.62

D. Sample collected at DSS station C-20

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	C4	38	1.00
10/22/01	C13	18	0.00
11/19/01	C22	44	0.00
12/6/01	C31	17	0.02
1/17/02	C40	3	0.31
2/19/02	C49	0	0.00
3/20/02	C58	70	0.81
4/18/02	C67	17	0.01
5/1/02	C76	3	0.90
6/13/02	C85	7	0.00
7/15/02	C94	4	0.49
8/29/02	C103	12	0.62

E. Sample collected at DSS station C-24

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	C5	25	1.00
10/22/01	C14	3	0.00
11/19/01	C23	18	0.00
12/6/01	C32	5	0.02
1/17/02	C41	4	0.31
2/19/02	C50	0	0.00
3/20/02	C59	20	0.81
4/18/02	C68	4	0.01
5/1/02	C77	5	0.90
6/13/02	C86	8	0.00
7/15/02	C95	5	0.49
8/29/02	C104	27	0.62

F. Sample collected at DSS station C-27

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	C6	23	1.00
10/22/01	C15	2	0.00
11/19/01	C24	30	0.00
12/6/01	C33	14	0.02
1/17/02	C42	1	0.31
2/19/02	C51	0	0.00
3/20/02	C60	9	0.81
4/18/02	C69	23	0.01
5/1/02	C78	11	0.90
6/13/02	C87	113	0.00
7/15/02	C96	18	0.49
8/29/02	C105	48	0.62

G. Sample collected at DSS station C-33

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	C7	43	1.00
10/22/01	C16	15	0.00
11/19/01	C25	26	0.00
12/6/01	C34	12	0.02
1/17/02	C43	2	0.31
2/19/02	C52	0	0.00
3/20/02	C61	2	0.81
4/18/02	C70	10	0.01
5/1/02	C79	3	0.90
6/13/02	C88	4	0.00
7/15/02	C97	2	0.49
8/29/02	C106	28	0.62

H. Sample collected at DSS station C-37.5Z

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	C8	33	1.00
10/22/01	C17	21	0.00
11/19/01	C26	85	0.00
12/6/01	C35	18	0.02
1/17/02	C44	27	0.31
2/19/02	C53	0	0.00
3/20/02	C62	12	0.81
4/18/02	C71	59	0.01
5/1/02	C80	6	0.90
6/13/02	C89	21	0.00
7/15/02	C98	25	0.49
8/29/02	C107	58	0.62

I. Sample collected at DSS station C-38

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	C9	20	1.00
10/22/01	C18	9	0.00
11/19/01	C27	56	0.00
12/6/01	C36	11	0.02
1/17/02	C45	2	0.31
2/19/02	C54*	0	0.00
3/20/02	C63	23	0.81
4/18/02	C72	49	0.01
5/1/02	C81	4	0.90
6/13/02	C90	3	0.00
7/15/02	C99	4	0.49
8/29/02	C108	26	0.62

**Table 4.** Source Tracking percentages of *E. coli* in the Coan River watershed with seasonality results.

# A. Samples collected at DSS station C-7

Station 0-1						
DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	C1	0.00	95.83	0.00	4.17	0.00
10/22/01	C10	0.00	95.83	0.00	0.00	4.17
11/19/01	C19	4.17	79.17	16.67	0.00	0.00
12/6/01	C28	16.67	70.83	12.50	0.00	0.00
1/17/02	C37	20.83	70.83	0.00	0.00	8.33
2/19/02	C46	4.17	95.83	0.00	0.00	0.00
3/20/02	C55	4.17	87.50	0.00	0.00	8.33
4/18/02	C64	4.17	91.67	0.00	0.00	4.17
5/1/02	C73	12.50	37.50	29.17	0.00	20.83
6/13/02	C82	0.00	91.67	0.00	0.00	8.33
7/15/02	C91	4.17	95.83	0.00	0.00	0.00
8/29/02	C100	4.17	66.67	16.67	4.17	8.33
	SUM	75.02	979.16	75.01	8.34	62.49
	AVERAGE	6.25	81.60	6.25	0.70	5.21
WET PERIOD						
JAN/FEB/MARCH		29.17	254.16	0.00	0.00	16.66
FOR SEASON		9.72	84.72	0.00	0.00	5.55
DRY PERIOD						_
JULY/AUGUST/S		8.34	258.33	16.67	8.34	8.33
EPT						
FOR SEASON		2.78	86.11	5.56	2.78	2.78

# B. Samples collected at DSS station C-15

31411011 0 10						
DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	C2	0.00	95.83	0.00	4.17	0.00
10/22/01	C11	0.00	95.83	0.00	0.00	4.17
11/19/01	C20	25.00	45.83	29.17	0.00	0.00
12/6/01	C29	8.33	83.33	8.34	0.00	0.00
1/17/02	C38	0.00	95.83	0.00	0.00	4.17
2/19/02	C46	4.17	95.83	0.00	0.00	0.00
3/20/02	C56	4.17	91.67	0.00	0.00	4.17
4/18/02	C65	4.17	87.50	0.00	0.00	8.33
5/1/02	C74	58.33	25.00	4.17	0.00	12.50
6/13/02	C83	16.67	70.83	0.00	4.17	8.33
7/15/02	C92	0.00	83.33	4.17	0.00	12.50
8/29/02	C101	12.50	25.00	50.00	8.33	4.17
	SUM	133.34	895.81	95.85	16.67	58.34
	AVERAGE	11.11	74.65	7.99	1.39	4.86
WET PERIOD						
JAN/FEB/MARCH		8.34	283.33	0.00	0.00	8.34
FOR SEASON		2.78	94.44	0.00	0.00	2.78
DRY PERIOD						
JULY/AUGUST/S		12.50	204.16	54.17	12.50	16.67
EPT						
FOR SEASON		4.17	68.05	18.06	4.17	5.56

# C. Samples Collected from DSS Station C-16

DOO Otation O 10						
DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	C3	83.33	8.33	0	0	8.33
10/22/01	C12	8.33	75	4.17	0	12.5
11/19/01	C21	12.5	79.17	8.33	0	0
12/6/01	C30	16.67	70.83	12.5	0	0
1/17/02	C39	29.17	62.5	8.33	0	0
2/19/02	C48	4.17	95.83	0	0	0
3/20/02	C57	0	41.67	4.17	0	54.17
4/18/02	C66	0	83.33	0	0	16.67
5/1/02	C75	54.17	33.33	0	0	12.5
6/13/02	C84	4.17	8.33	0	62.5	25
7/15/02	C93	0	45.83	54.17	0	0
8/29/02	C102	41.67	50	8.33	0	0
	SUM	254.18	654.15	100.00	62.50	129.17
	AVERAGE	21.18	54.51	8.33	5.21	10.76
WET PERIOD						
JAN/FEB/MARCH		33.34	200.00	12.50	0.00	54.17
FOR SEASON		11.11	66.67	4.17	0.00	18.06
DRY PERIOD						
JULY/AUGUST/S		125.00	104.16	62.50	0.00	8.33
EPT						
FOR SEASON		41.67	34.72	20.83	0.00	2.78

D. Samples Collected from DSS Station C-20

DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	C4	83.33	12.50	0.00	0.00	4.17
10/22/01	C13	8.33	91.67	0.00	0.00	0.00
11/19/01	C22	12.50	75.00	12.50	0.00	0.00
12/6/01	C31	20.83	54.17	25.00	0.00	0.00
1/17/02	C40	20.83	58.33	4.17	0.00	16.67
2/19/02	C49	0.00	100.00	0.00	0.00	0.00
3/20/02	C58	0.00	62.50	0.00	0.00	37.50
4/18/02	C67	0.00	91.67	0.00	0.00	8.33
5/1/02	C76	29.17	58.33	4.17	4.17	4.17
6/13/02	C85	25.00	8.33	4.17	37.50	25.00
7/15/02	C94	12.50	75.00	8.33	0.00	4.17
8/29/02	C103	25.00	70.83	4.17	0.00	0.00
	SUM	237.49	758.33	62.51	41.67	100.01
	AVERAGE	19.79	63.19	5.21	3.47	8.33
WET PERIOD						
JAN/FEB/MARCH		20.83	220.83	4.17	0.00	54.17
FOR SEASON		6.94	73.61	1.39	0.00	18.06
DRY PERIOD						
JULY/AUGUST/S		120.83	158.33	12.50	0.00	8.34
EPT						
FOR SEASON		40.28	52.78	4.17	0.00	2.78

# E. Samples Collected from DSS Station C-24

DOO GLATION 0-24						
DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	C5	54.17	25.00	0.00	4.17	16.67
10/22/01	C14	0.00	95.83	0.00	0.00	4.17
11/19/01	C23	37.50	58.33	4.17	0.00	0.00
12/6/01	C32	16.67	62.50	16.67	4.17	0.00
1/17/02	C41	33.33	50.00	4.17	12.50	0.00
2/19/02	C50	0.00	0.00	0.00	0.00	0.00
3/20/02	C59	0.00	45.83	16.67	16.67	20.83
4/18/02	C68	4.17	66.67	0.00	0.00	29.17
5/1/02	C77	91.67	0.00	0.00	8.33	0.00
6/13/02	C86	66.67	4.17	20.83	4.17	4.17
7/15/02	C95	4.17	66.67	29.17	0.00	0.00
8/29/02	C104	4.17	83.33	12.50	0.00	0.00
	SUM	312.52	558.33	104.18	50.01	75.01
	AVERAGE	26.04	46.53	8.68	4.17	6.25
WET PERIOD						
JAN/FEB/MARCH		33.33	95.83	20.84	29.17	20.83
FOR SEASON		11.11	31.94	6.95	9.72	6.94
DRY PERIOD						
JULY/AUGUST/S		62.51	175.00	41.67	4.17	16.67
EPT						
FOR SEASON		20.84	58.33	13.89	1.39	5.56

# F. Samples Collected from DSS Station C-27

DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	C6	25.00	25.00	8.33	25.00	16.67
10/22/01	C15	0.00	87.50	4.17	0.00	8.33
11/19/01	C24	54.17	33.33	8.33	4.17	0.00
12/6/01	C33	4.17	79.17	8.33	4.17	4.17
1/17/02	C42	12.50	62.50	16.67	4.17	4.17
2/19/02	C51	0.00	0.00	0.00	0.00	0.00
3/20/02	C60	8.33	75.00	8.33	0.00	8.33
4/18/02	C69	0.00	91.67	4.17	0.00	4.17
5/1/02	C78	95.83	4.17	0.00	0.00	0.00
6/13/02	C87	12.50	79.17	0.00	4.17	4.17
7/15/02	C96	41.67	20.83	25.00	4.17	8.33
8/29/02	C105	0.00	66.67	33.33	0.00	0.00
	SUM	254.17	625.01	116.66	45.85	58.34
	AVERAGE	21.18	52.08	9.72	3.82	4.86
WET PERIOD						
JAN/FEB/MARCH		20.83	137.50	25.00	4.17	12.50
FOR SEASON		6.94	45.83	8.33	1.39	4.17
DRY PERIOD						
JULY/AUGUST/S EPT		66.67	112.50	66.66	29.17	25.00
FOR SEASON		22.22	37.50	22.22	9.72	8.33

G. Samples Collected from DSS Station C-33

DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	C7	0.00	75.00	4.17	4.17	16.67
10/22/01	C16	4.17	75.00	4.17	0.00	16.67
11/19/01	C25	25.00	37.50	29.17	4.17	4.17
12/6/01	C34	12.50	62.50	20.83	4.17	0.00
1/17/02	C43	0.00	91.67	0.00	4.17	4.17
2/19/02	C52	0.00	0.00	0.00	0.00	0.00
3/20/02	C61	0.00	87.50	8.33	0.00	4.17
4/18/02	C70	8.33	75.00	4.17	0.00	12.50
5/1/02	C79	50.00	25.00	4.17	0.00	20.83
6/13/02	C88	41.67	54.17	0.00	4.17	0.00
7/15/02	C97	0.00	95.83	0.00	0.00	4.17
8/29/02	C106	8.33	29.17	54.17	0.00	8.33
	SUM	150.00	708.34	129.18	20.85	91.68
	AVERAGE	12.50	59.03	10.77	1.74	7.64
WET PERIOD						
JAN/FEB/MARCH		0.00	179.17	8.33	4.17	8.34
FOR SEASON		0.00	59.72	2.78	1.39	2.78
DRY PERIOD						
JULY/AUGUST/S		8.33	200.00	58.34	4.17	29.17
EPT						
FOR SEASON		2.78	66.67	19.45	1.39	9.72

H. Samples Collected from DSS Station C-37.52

DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	C8	4.17	62.50	12.50	4.17	16.67
10/22/01	C17	8.33	83.33	0.00	0.00	8.33
11/19/01	C26	50.00	41.67	8.33	0.00	0.00
12/6/01	C35	45.83	37.50	12.50	4.17	0.00
1/17/02	C44	0.00	100.00	0.00	0.00	0.00
2/19/02	C53	0.00	95.83	0.00	0.00	4.17
3/20/02	C62	0.00	91.67	0.00	0.00	8.33
4/18/02	C71	0.00	91.67	0.00	0.00	8.33
5/1/02	C80	41.67	4.17	41.67	0.00	12.50
6/13/02	C89	62.50	37.50	0.00	0.00	0.00
7/15/02	C98	0.00	37.50	20.83	0.00	41.67
8/29/02	C107	20.83	16.67	33.33	0.00	29.17
	SUM	233.33	700.01	129.16	8.34	129.17
	AVERAGE	19.44	58.33	10.76	0.70	10.76
WET PERIOD						
JAN/FEB/MARCH		0.00	287.50	0.00	0.00	12.50
FOR SEASON		0.00	95.83	0.00	0.00	4.17
DRY PERIOD						
JULY/AUGUST/S EPT		25.00	116.67	66.66	4.17	87.51
FOR SEASON		8.33	38.89	22.22	1.39	29.17

I. Samples Collected from DSS Station C-38

DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	C9	4.17	75.00	8.33	12.50	0.00
10/22/01	C18	4.17	66.67	0.00	8.33	20.83
11/19/01	C27	33.33	66.67	0.00	0.00	0.00
12/6/01	C36	0.00	25.00	0.00	29.17	45.83
1/17/02	C45	0.00	95.83	4.17	0.00	0.00
2/19/02	C54*	0.00	0.00	0.00	0.00	0.00
3/20/02	C63	0.00	100.00	0.00	0.00	0.00
4/18/02	C72	75.00	8.33	12.50	0.00	4.17
5/1/02	C81	54.17	25.00	16.67	0.00	4.17
6/13/02	C90	0.00	100.00	0.00	0.00	0.00
7/15/02	C99	4.17	62.50	12.50	0.00	20.83
8/29/02	C108	12.50	62.50	16.67	4.17	4.17
	* No					
	isolates					
	SUM	187.51	687.50	70.84	54.17	100.00
	AVERAGE	15.63	57.29	5.90	4.51	8.33
WET PERIOD						
JAN/FEB/MARCH		0.00	195.83	4.17	0.00	0.00
FOR SEASON		0.00	65.28	1.39	0.00	0.00
DRY PERIOD				<u> </u>		
JULY/AUGUST/S EPT		20.84	200.00	37.50	16.67	25.00
FOR SEASON		6.95	66.67	12.50	5.56	8.33

**Table 4A.** Samples collected on July 15, 2002 (top table), and August 23, 2002 (bottom table). The 24 hour holding times are shown below the 6 hour samples. Paired test results were 0.99 for the July samples and 0.45 for the August samples.

Site # Sample# # of isolates % Bird % Human %Livestock %Pets %Wildlife

Site #	Sample#	# of isolates	% Bird	% Human	%Livestock	%Pets	%Wildlife
C-7	C91	0.7	4.17	95.83	0.00	0.00	0.00
C-7	C91 (24)	0.3	8.33	91.67	0.00	0.00	0.00
C-15	C92	1.3	0.00	83.33	4.17	0.00	12.50
C-15	C92(24)	2	0.00	95.83	4.17	0.00	0.00
C-16	C93	4.7	0.00	45.83	54.17	0.00	0.00
C-16	C93(24)	6	4.17	20.83	70.83	0.00	4.17
C-20	C94	1	12.50	75.00	8.33	0.00	4.17
C-20	C94(24)	2.3	8.33	79.17	4.17	0.00	8.33
C-24	C95	2.7	4.17	66.67	29.17	0.00	0.00
C-24	C95(24)	2.3	25.00	50.00	16.67	0.00	8.33
C-27	C96	8.7	41.67	20.83	25.00	4.17	8.33
C-27	C96(24)	7	50.00	16.67	0.00	12.50	20.83
C-33	C97	2.7	0.00	95.83	0.00	0.00	4.17
C-33	C97(24)	1	4.17	87.50	4.17	0.00	4.17
C-37.5Z	C98	4.7	0.00	37.50	20.83	0.00	41.67
C-37.5Z	C98(24)	5	12.50	0.00	29.17	0.00	58.33
C-38	C99	2	4.17	62.50	12.50	0.00	20.83
C-38	C99(24)	2.7	4.17	62.50	25.00	0.00	8.33
Average	6hr	3.17	7.41	64.81	17.13	0.46	10.19
	24hr	3.18	12.96	56.02	17.13	1.39	12.50
Site #	Sample#	# of isolates	% Bird	% Human	%Livestock	%Pets	%Wildlife
Site #	Sample#	# of isolates	% Bird 4 17	% Human	%Livestock	%Pets 4 17	%Wildlife 8.33
C-7	C100	10	4.17	66.67	16.67	4.17	8.33
	C100 C100						
C-7 C-7	C100 C100 (24)	10 11.7	4.17 12.50	66.67 25.00	16.67 45.83	4.17 0.00	8.33 16.67
C-7	C100 C100 (24) C101	10	4.17	66.67 25.00 58.33	16.67 45.83 20.83	4.17	8.33
C-7 C-7 C-15	C100 C100 (24) C101 C101(24)	10 11.7 8	4.17 12.50 0.00	66.67 25.00	16.67 45.83	4.17 0.00 4.17	8.33 16.67 16.67
C-7 C-7 C-15 C-15	C100 C100 (24) C101 C101(24) C102	10 11.7 8 8	4.17 12.50 0.00 12.50	66.67 25.00 58.33 25.00	16.67 45.83 20.83 50.00	4.17 0.00 4.17 8.33	8.33 16.67 16.67 4.17
C-7 C-7 C-15 C-15 C-16	C100 C100 (24) C101 C101(24)	10 11.7 8 8 25.3	4.17 12.50 0.00 12.50 4.17	66.67 25.00 58.33 25.00 33.33	16.67 45.83 20.83 50.00 41.67	4.17 0.00 4.17 8.33 4.17	8.33 16.67 16.67 4.17 16.67
C-7 C-7 C-15 C-15 C-16 C-16	C100 C100 (24) C101 C101(24) C102 C102(24)	10 11.7 8 8 25.3 16.7	4.17 12.50 0.00 12.50 4.17 41.67	66.67 25.00 58.33 25.00 33.33 50.00	16.67 45.83 20.83 50.00 41.67 8.33	4.17 0.00 4.17 8.33 4.17 0.00	8.33 16.67 16.67 4.17 16.67 0.00
C-7 C-7 C-15 C-15 C-16 C-16 C-20	C100 C100 (24) C101 C101(24) C102 C102(24) C103	10 11.7 8 8 25.3 16.7 12.3	4.17 12.50 0.00 12.50 4.17 41.67 4.17	66.67 25.00 58.33 25.00 33.33 50.00 45.83	16.67 45.83 20.83 50.00 41.67 8.33 37.50	4.17 0.00 4.17 8.33 4.17 0.00 4.17	8.33 16.67 16.67 4.17 16.67 0.00 8.33
C-7 C-7 C-15 C-15 C-16 C-16 C-20 C-20	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104	10 11.7 8 8 25.3 16.7 12.3 12.7	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00	66.67 25.00 58.33 25.00 33.33 50.00 45.83 70.83	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00
C-7 C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24)	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17	66.67 25.00 58.33 25.00 33.33 50.00 45.83 70.83 37.50	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17
C-7 C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24 C-24 C-27 C-27	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104 C104(24)	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3 25.3	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17 4.17	66.67 25.00 58.33 25.00 33.33 50.00 45.83 70.83 37.50 83.33	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17 12.50	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00 0.00	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17 0.00
C-7 C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24 C-24 C-27	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104 C104(24) C105	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3 25.3 48	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17 4.17 4.17	66.67 25.00 58.33 25.00 33.33 50.00 45.83 70.83 37.50 83.33 41.67	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17 12.50 29.17	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00 0.00 8.33	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17 0.00 16.67
C-7 C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24 C-24 C-27 C-27	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104 C104(24) C105 C105(24)	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3 25.3 48	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17 4.17 4.17 0.00	66.67 25.00 58.33 25.00 33.33 50.00 45.83 70.83 37.50 83.33 41.67 66.67	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17 12.50 29.17 33.33	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00 0.00 8.33 0.00	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17 0.00 16.67 0.00
C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24 C-24 C-27 C-27 C-33	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104 C104 C105 C105(24) C106	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3 25.3 48 48 28 27 58	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17 4.17 4.17 0.00 0.00	58.33 25.00 33.33 50.00 45.83 70.83 37.50 83.33 41.67 66.67 41.67	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17 12.50 29.17 33.33 25.00	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00 0.00 8.33 0.00 16.67	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17 0.00 16.67 0.00 16.67
C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24 C-27 C-27 C-33 C-33 C-37.5Z C-37.5Z	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104 C104 C105 C105(24) C106 C106(24) C107 C107(24)	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3 25.3 48 48 28 27 58 55.3	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17 4.17 0.00 0.00 8.33 0.00 20.83	58.33 25.00 33.33 50.00 45.83 70.83 37.50 83.33 41.67 66.67 41.67 29.17	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17 12.50 29.17 33.33 25.00 54.17 8.33 33.33	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00 0.00 8.33 0.00 16.67 0.00 4.17 0.00	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17 0.00 16.67 0.00 16.67 8.33 16.67 29.17
C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24 C-27 C-27 C-33 C-33 C-37.5Z C-37.5Z C-38	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104 C104 C105 C105(24) C106 C106(24) C107	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3 25.3 48 48 28 27 58 55.3 26.3	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17 4.17 0.00 0.00 8.33 0.00	66.67 25.00 58.33 25.00 33.33 50.00 45.83 70.83 37.50 83.33 41.67 66.67 41.67 29.17 70.83	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17 12.50 29.17 33.33 25.00 54.17 8.33	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00 0.00 8.33 0.00 16.67 0.00 4.17	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17 0.00 16.67 0.00 16.67 8.33 16.67
C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24 C-27 C-27 C-33 C-33 C-37.5Z C-37.5Z	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104 C104 C105 C105(24) C106 C106(24) C107 C107(24) C108 C108(24)	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3 25.3 48 48 28 27 58 55.3 26.3 17	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17 4.17 0.00 0.00 8.33 0.00 20.83 12.50 8.33	66.67 25.00 58.33 25.00 33.33 50.00 45.83 70.83 37.50 83.33 41.67 66.67 41.67 29.17 70.83 16.67 62.50 50.00	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17 12.50 29.17 33.33 25.00 54.17 8.33 33.33 16.67 33.33	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00 0.00 8.33 0.00 16.67 0.00 4.17 0.00 4.17	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17 0.00 16.67 8.33 16.67 29.17 4.17 8.33
C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24 C-27 C-27 C-33 C-33 C-37.5Z C-37.5Z C-38	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104 C104(24) C105 C105(24) C106 C106(24) C107 C107(24) C108 C108(24) 6 hr	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3 25.3 48 48 28 27 58 55.3 26.3 17 27.02	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17 4.17 0.00 0.00 8.33 0.00 20.83 12.50 8.33 3.71	66.67 25.00 58.33 25.00 33.33 50.00 45.83 70.83 37.50 83.33 41.67 66.67 41.67 29.17 70.83 16.67 62.50 50.00 50.93	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17 12.50 29.17 33.33 25.00 54.17 8.33 33.33 16.67 33.33 22.22	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00 0.00 8.33 0.00 16.67 0.00 4.17 0.00 4.17 0.00 5.56	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17 0.00 16.67 8.33 16.67 29.17 4.17 8.33 17.59
C-7 C-7 C-15 C-15 C-16 C-16 C-20 C-20 C-24 C-27 C-27 C-33 C-33 C-37.5Z C-37.5Z C-38 C-38	C100 C100 (24) C101 C101(24) C102 C102(24) C103 C103(24) C104 C104 C105 C105(24) C106 C106(24) C107 C107(24) C108 C108(24)	10 11.7 8 8 25.3 16.7 12.3 12.7 27.3 25.3 48 48 28 27 58 55.3 26.3 17	4.17 12.50 0.00 12.50 4.17 41.67 4.17 25.00 4.17 4.17 0.00 0.00 8.33 0.00 20.83 12.50 8.33	66.67 25.00 58.33 25.00 33.33 50.00 45.83 70.83 37.50 83.33 41.67 66.67 41.67 29.17 70.83 16.67 62.50 50.00	16.67 45.83 20.83 50.00 41.67 8.33 37.50 4.17 4.17 12.50 29.17 33.33 25.00 54.17 8.33 33.33 16.67 33.33	4.17 0.00 4.17 8.33 4.17 0.00 4.17 0.00 0.00 0.00 8.33 0.00 16.67 0.00 4.17 0.00 4.17	8.33 16.67 16.67 4.17 16.67 0.00 8.33 0.00 54.17 0.00 16.67 8.33 16.67 29.17 4.17 8.33

**Table 5.** Numbers of *E coli* isolates in the Little Wicomico watershed with rainfall 3 days prior to collection.

A. Samples Collected from DSS Station W-9W

	1		
DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	W1	9	1.45
10/22/01	W7	9	0.00
11/19/01	W13	6	0.00
12/6/01	W19	20	0.02
1/17/02	W25	1	0.31
2/19/02	W31	0	0.00
3/20/02	W37	54	0.70
4/18/02	W43	16	0.12
5/1/02	W49	5	0.90
6/13/02	W55	3	0.00
7/15/02	W61	3	0.49
8/29/02	W67	3	0.06

B. Samples Collected from DSS Station W-9X

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	W2	12	1.45
10/22/01	W8	3	0.00
11/19/01	W14	2	0.00
12/6/01	W20	6	0.02
1/17/02	W26	1	0.31
2/19/02	W32	0	0.00
3/20/02	W38	18	0.70
4/18/02	W44	13	0.12
5/1/02	W50	7	0.90
6/13/02	W56	2	0.00
7/15/02	W62	2	0.49
8/29/02	W68	2	0.06

C. Samples Collected from DSS Station W-13.5Z

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	W3	30	1.45
10/22/01	W9	3	0.00
11/19/01	W15	3	0.00
12/6/01	W21	11	0.02
1/17/02	W27	2	0.31
2/19/02	W33	1	0.00
3/20/02	W39	58	0.70
4/18/02	W45	25	0.12
5/1/02	W51	9	0.90
6/13/02	W57	2	0.00
7/15/02	W63	4	0.49
8/29/02	W69	3	0.06

D. Samples Collected from DSS Station W-16

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	W4	32	1.45
10/22/01	W10	9	0.00
11/19/01	W16	5	0.00
12/6/01	W22	18	0.02
1/17/02	W28	1	0.31
2/19/02	W34	1	0.00
3/20/02	W40	71	0.70
4/18/02	W46	39	0.12
5/1/02	W52	46	0.90
6/13/02	W58	6	0.00
7/15/02	W64	7	0.49
8/29/02	W70	17	0.06

E. Samples Collected from DSS Station W-19

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	W5	77	1.45
10/22/01	W11	22	0.00
11/19/01	W17	23	0.00
12/6/01	W23	20	0.02
1/17/02	W29	2	0.31
2/19/02	W35	13	0.00
3/20/02	W41	53	0.70
4/18/02	W47	37	0.12
5/1/02	W53	17	0.90
6/13/02	W59	26	0.00
7/15/02	W65	33	0.49
8/29/02	W71	13	0.06

F. Samples Collected from DSS Station W-20

DATE	Sample #	No. isolates/100 ml	Rain (inches)
9/25/01	W6	55	1.45
10/22/01	W12	13	0.00
11/19/01	W18	36	0.00
12/6/01	W24	18	0.02
1/17/02	W30	3	0.31
2/19/02	W36	2	0.00
3/20/02	W42	60	0.70
4/18/02	W48	62	0.12
5/1/02	W54	37	0.90
6/13/02	W60	59	0.00
7/15/02	W66	8	0.49
8/29/02	W72	19	0.06

**Table 6.** Source Tracking percentages of *E. coli* in the Little Wicomico River watershed with seasonality results.

A. Samples Collected from DSS Station W-9W

Station W-3W						
DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	W1	4.17	75.00	4.17	16.67	0.00
10/22/01	W7	0.00	75.00	0.00	0.00	25.00
11/19/01	W13	29.17	54.17	12.50	4.17	0.00
12/6/01	W19	8.33	8.33	0.00	41.67	41.67
1/17/02	W25	25.00	70.83	0.00	0.00	4.17
2/19/02	W31	12.50	87.50	0.00	0.00	0.00
3/20/02	W37	12.50	67.50	0.00	0.00	0.00
4/18/02	W43	33.33	62.50	4.17	0.00	0.00
5/1/02	W49	33.33	0.00	4.17	0.00	62.50
6/13/02	W55	0.00	100.00	0.00	0.00	0.00
7/15/02	W61	0.00	58.33	29.17	0.00	12.50
8/29/02	W67	0.00	79.17	12.50	4.17	4.17
	SUM	158.33	738.33	66.68	66.68	150.01
	AVERAGE	13.19	61.53	5.56	5.56	12.50
WET PERIOD						
JAN/FEB/MARCH		50.00	225.83	0.00	0.00	4.17
FOR SEASON		16.67	75.28	0.00	0.00	1.39
DRY PERIOD						
JULY/AUGUST/SEP T		4.17	212.50	45.84	20.84	16.67
FOR SEASON		1.39	70.83	15.28	6.95	5.56

B. Samples Collected from DSS Station W-9X

Station W-3A						
DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	W2	4.17	70.83	12.50	8.33	4.17
10/22/01	W8	4.17	91.67	4.17	0.00	0.00
11/19/01	W14	8.33	83.33	8.33	0.00	0.00
12/6/01	W20	0.00	50.00	0.00	16.67	33.33
1/17/02	W26	20.83	62.50	4.17	0.00	12.50
2/19/02	W32	0.00	58.33	0.00	0.00	41.67
3/20/02	W38	16.67	66.67	8.33	4.17	4.17
4/18/02	W44	25.00	66.67	8.33	0.00	0.00
5/1/02	W50	62.50	20.83	0.00	8.33	8.33
6/13/02	W56	25.00	41.67	20.83	4.17	8.33
7/15/02	W62	4.17	62.50	29.17	0.00	4.17
8/29/02	W68	25.00	66.67	8.33	0.00	0.00
	SUM	195.84	741.67	104.16	41.67	116.67
	AVERAGE	16.32	61.81	8.68	3.47	9.72
WET PERIOD						
JAN/FEB/MARCH		37.50	187.50	12.50	4.17	58.34
FOR SEASON		12.50	62.50	4.17	1.39	19.45
DRY PERIOD						
JULY/AUGUST/SEP		33.34	200.00	50.00	8.33	8.34
Т						
FOR SEASON		11.11	66.67	16.67	2.78	2.78

# C. Samples Collected from DSS Station W-13.5Z

DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	W3	33.33	33.33	25.00	0.00	8.33
10/22/01	W9	12.50	70.83	4.17	12.50	0.00
11/19/01	W15	16.67	83.33	0.00	0.00	0.00
12/6/01	W21	0.00	37.50	0.00	58.33	4.17
1/17/02	W27	41.67	37.50	8.33	8.33	4.17
2/19/02	W33	0.00	70.83	0.00	0.00	29.17
3/20/02	W39	25.00	37.50	12.50	0.00	25.00
4/18/02	W45	45.83	25.00	16.67	0.00	12.50
5/1/02	W51	4.17	95.83	0.00	0.00	0.00
6/13/02	W57	37.50	41.67	16.67	4.17	0.00
7/15/02	W63	12.50	33.33	29.17	0.00	25.00
8/29/02	W69	45.83	50.00	4.17	0.00	0.00
	SUM	275.00	616.65	116.68	83.33	108.34
	AVERAGE	22.92	51.39	9.72	6.94	9.03
WET PERIOD						
JAN/FEB/MARCH		66.67	145.83	20.83	8.33	58.34
FOR SEASON		22.22	48.61	6.94	2.78	19.45
DRY PERIOD						
JULY/AUGUST/SEP T		91.66	116.66	58.34	0.00	33.33
FOR SEASON		30.55	38.89	19.45	0.00	11.11

D. Samples Collected from DSS Station W-16

Otation W-10						
DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	W4	8.33	50.00	12.50	16.67	12.50
10/22/01	W10	16.67	66.67	16.67	0.00	0.00
11/19/01	W16	50.00	45.83	4.17	0.00	0.00
12/6/01	W22	79.17	4.17	4.17	0.00	12.50
1/17/02	W28	16.67	83.33	0.00	0.00	0.00
2/19/02	W34	0.00	91.67	8.33	0.00	0.00
3/20/02	W40	16.67	50.00	0.00	20.83	12.50
4/18/02	W46	50.00	4.17	25.00	0.00	20.83
5/1/02	W52	0.00	95.83	0.00	0.00	4.17
6/13/02	W58	33.33	62.50	4.17	0.00	0.00
7/15/02	W64	8.33	66.67	12.50	4.17	8.33
8/29/02	W70	20.83	50.00	29.17	0.00	0.00
	SUM	300.00	670.84	116.68	41.67	70.83
	AVERAGE	25.00	55.90	9.72	3.47	5.90
WET PERIOD						
JAN/FEB/MARCH		33.34	225.00	8.33	20.83	12.50
FOR SEASON		11.11	75.00	2.78	6.94	4.17
DRY PERIOD			_	_		
JULY/AUGUST/SEP		37.49	166.67	54.17	20.84	20.83
Т						
FOR SEASON		12.50	55.56	18.06	6.95	6.94

# E. Samples Collected from DSS Station W-19

DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	W5	0.00	62.50	8.33	8.33	20.83
10/22/01	W11	12.50	66.67	4.17	0.00	16.67
11/19/01	W17	29.17	62.50	8.33	0.00	0.00
12/6/01	W23	45.83	12.50	0.00	0.00	41.67
1/17/02	W29	37.50	25.00	29.17	4.17	4.17
2/19/02	W35	0.00	62.50	8.33	0.00	29.17
3/20/02	W41	4.17	79.17	8.33	0.00	8.33
4/18/02	W47	4.17	45.83	8.33	0.00	41.67
5/1/02	W53	100.00	0.00	0.00	0.00	0.00
6/13/02	W59	58.33	37.50	0.00	4.17	0.00
7/15/02	W65	8.33	45.83	37.50	0.00	8.33
8/29/02	W71	25.00	58.33	4.17	12.50	0.00
	SUM	325.00	558.33	116.66	29.17	170.84
	AVERAGE	27.08	46.53	9.72	2.43	14.24
WET PERIOD						
JAN/FEB/MARCH		41.67	166.67	45.83	4.17	41.67
FOR SEASON		13.89	55.56	15.28	1.39	13.89
DRY PERIOD						
JULY/AUGUST/SEP T		33.33	166.66	50.00	20.83	29.16
FOR SEASON		11.11	55.55	16.67	6.94	9.72

F. Samples Collected from DSS Station W-20

Otation W-20						
DATE	Sample #	Birds	Human	Livestock	Pets	Wildlife
9/25/01	W6	4.17	50.00	4.17	29.17	12.50
10/22/01	W12	0.00	75.00	8.33	4.17	12.50
11/19/01	W18	41.57	58.33	0.00	0.00	0.00
12/6/01	W24	20.83	16.67	25.00	16.67	20.83
1/17/02	W30	16.67	20.83	20.83	4.17	37.50
2/19/02	W36	37.50	58.33	4.17	0.00	0.00
3/20/02	W42	20.83	79.17	0.00	0.00	0.00
4/18/02	W48	4.17	62.50	0.00	4.17	29.17
5/1/02	W54	87.50	4.17	0.00	4.17	4.17
6/13/02	W60	0.00	20.83	0.00	29.17	50.00
7/15/02	W66	62.50	8.33	4.17	0.00	25.00
8/29/02	W72	12.50	50.00	12.50	8.33	16.67
	SUM	308.20	504.20	79.20	100.00	208.30
	AVERAGE	25.70	42.00	6.60	8.30	17.40
WET PERIOD						
JAN/FEB/MARCH		75.00	158.30	25.00	4.20	37.50
FOR SEASON		25.00	52.80	8.30	1.40	12.50
DRY PERIOD						
JULY/AUGUST/SEP		79.20	108.30	20.80	37.50	54.20
Т						
FOR SEASON		26.40	36.10	6.90	12.50	18.10

# **APPENDIX B**

2) Nonpoint Sources of Fecal Contamination in the Coan River and Little Wicomico River Watersheds Addendum to Final Report presented to the Virginia Department of Environmental Quality

# Nonpoint Sources of Fecal Contamination in the Coan River and Little Wicomico River Watersheds

Addendum to Final Report presented to

The Virginia Department of Environmental Quality

Charles Hagedorn, Professor

and

Cheryl Szeles, Graduate Research Assistant

Department of Crop and Soil Environmental Sciences

Virginia Polytechnic Institute and State University

Blacksburg, VA 24061-0404

#### **Revision of Results Based on Isolate Probabilities**

Two approaches have emerged in source tracking regarding analyzing the patterns of isolates from water samples (unknown sources) against libraries of known sources. The first approach has been widely used with phenotypic source tracking methods (such as ARA) and is based on an ecological perspective where known source isolates in the library are statistically evaluated and sorted into groups or clusters that are source dependent. The goodness-of-fit of these source-derived clusters is reflected in the rates of correct classification (RCC) for each source in the library, and RCCs are averaged to produce the average rate of correct classification (ARCC). Isolates from water samples are then patterned and their patterns are placed into the source-dependent cluster that they most closely resemble. The higher the ARCC of the entire library, the greater the confidence that the water isolates are correctly classified. This was the approach used in the DEQ-DSS project and was described in the final report. The ARCC of the library for the Coan and Little Wicomico Rivers was 71.9%, in the upper range of ARCCs reported in the literature.

The second approach has been widely used with molecular source tracking methods (such as ribotyping) and is based on a clinical perspective where known source isolates in the library are not statistically evaluated and sorted into any types of groups or clusters. Isolates from water samples are patterned and their patterns are compared against every isolate in the library and are identified based on the known source isolate that they most closely resemble. Since no statistical evaluation of the library is involved, most publications using this clinical approach only include those water isolates that resemble a known source isolate at a given probability level, usually 80% or above. Those with matching probabilities below 80% are placed in an unknown or nomatch category. In published reports to date, anywhere from one-third to two-thirds of the isolates from water samples are commonly placed in the no-match category.

There have been many debates over molecular and phenotypic techniques in the bacterial source-tracking community when examining the validity of research studies. One criticism that has been directed at ARA is that phenotypic methods are inaccurate when compared to molecular methods and if individual isolates were evaluated at an 80% probability or greater, most if not all of the unknown isolates would be lost due to low probabilities. Simmons *et al.* (2002) performed a molecular BST technique, pulsed-field gel electrophoresis (PFGE), on the Four Mile Run Watershed (Arlington County, Va. They rejected 49% of *E. coli* unknown source isolates (averaged over all sampling sites) when using an 80% probability with PFGE and obtained a match with 278 of 539 total isolates. Samadpour and Chechowitz (1995) performed ribotyping on 589 *E. coli* isolates in Little Soos Creek (King County, Wa) and found that the unknown source isolates had 171 different ribotype profiles, and 67% of these profiles could not be matched by the known source library.

In Tables 1 and 2 (below) the average corrected percentages are shown, and these percentages were isolates where their individual probabilities were greater than 80%. The percentages found in parentheses are actually the old percentages as described in the final report and did not include any cutoff level for isolate probabilities.

In Table 1 the percentages of water isolates placed in the no-match category ranged from 44.7% for station C-17 to 79.2% for station C-33. An average of 53% of all the unknown isolates were not matched and were rejected using an 80% probability for the Coan River Watershed. In Table 2 the percentages of water isolates placed in the no-match category ranged from 43.5% for station W-9X to 55.8% for station W-20. An average of 52% of all the unknown isolates were not matched and were rejected using an 80% probability for the Little Wicomico Watershed. Like Simmons *et al.* (2002) with PFGE, about 50% of the unknown isolates were lost using an 80% probability cutoff.

**Table 1.** Coan River Corrected Percentage of Sources and Unknown Percentage

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		AVERAGE	CORRECT	PERCENT/	AGES	
			OLD % in ( )			
DSS STATION	BIRD	HUMAN	LIVESTOCK	PETS	WILDLIFE	UNKNOWN %
C-7	9.8 (6.3)	35.8 (81.6)	1.7 (6.3)	0.0 (0.7)	0.8 (5.2)	51.9
C-15	11.5 (11.1)	33.3 (74.7)	5.9 (8.0)	0.0 (1.4)	2.5 (4.9)	46.8
C-16	26.4 (21.2)	21.9 (54.5)	3.5 (8.3)	0.0 (5.2)	3.5 (10.8)	44.7
C-20	12.9 (19.8)	31.2 (63.2)	1.9 (5.2)	0.0 (3.5)	3.4 (8.3)	50.6
C-24	19.5 (26.0)	28.7 (46.5)	0.5 (8.7)	0.7 (4.2)	0.4 (6.3)	50.2
C-27	12.5 (21.2)	24.9 (45.8)	1.8 (11.1)	0.4 (3.5)	0.4 (5.6)	60.0
C-33	5.9 (9.4)	10.7 (58.0)	3.0 (12.2)	0.8 (2.8)	0.4 (9.4)	79.2
C-37.5Z	9.2 (14.2)	34.8 (57.3)	6.1 (13.9)	0.0 (1.4)	5.0 (13.2)	44.9
C-38	10.0 (25.7)	32.3 (50.7)	5.5 (6.3)	1.6 (5.6)	3.9 (8.7)	46.7

Table 2. Little Wicomico Corrected Percentage of Sources and Unknown Percentage

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DSS STATION		AVERAGE	CORRECT	PERC	ENTAGES	
			OLD % in ( )			
	BIRD	HUMAN	LIVESTOCK	PETS	WILDLIFE	UNKNOWN %
W-9W	9.2 (13.2)	28.9 (49.0)	4.0 (5.6)	1.9 (8.0)	4.5 (12.8)	51.5
W-9X	17.4 (16.3)	24.6 (64.2)	4.1 (7.6)	1.6 (3.1)	8.8 (10.8)	43.5
W-13.5Z	13.5 (20.1)	18.6 (53.8)	4.5 (9.4)	4.4 (6.9)	10.5 (9.7)	48.5
W-16	20.3 (22.2)	21.4 (54.9)	2.6 (10.1)	0.0 (4.2)	0.4 (8.7)	55.3
W-19	14.5 (22.2)	23.9 (45.8)	2.5 (9.7)	0.8 (2.4)	3.4 (19.1)	54.9
W-20	17.1 (25.7)	19.8 (42.0)	1.8 (6.6)	1.4 (8.3)	4.1 (17.4)	55.8

#### Conclusions

The phenotypic method employed in our study (ARA) and the molecular methods included in the references provided the same results when using the 80% probability level, and the dominant sources of human followed by birds were not changed (from the previously submitted final report) when the no-match isolates were removed from all categories in Tables 1 and 2. Therefore, the argument that ARA is less accurate than molecular methods must be rejected, as applying the 80% level to the results from the Coan and Little Wicomico Rivers produced the same type of results as those reported for molecular methods.

The more important issue is why so many isolates are placed in the unknown category when using an 80% cutoff. This is clearly related to the representativeness of the known source library, and the loss of isolates means that the library does not have appropriate patterns to match against them (no-match). There are two approaches to consider; the first is to test libraries for representativeness. Such testing is now commonplace with phenotypic method but has not been widely used with molecular methods. Until this is done, it will not be possible to make decisions regarding the usefulness of known source libraries. The second approach is to use a lower percent cutoff as there is nothing justifiable about 80% other than precedent. For example, if a library was divided into five source categories, the probability of an unknown source isolate being placed in any one of the five categories is 20%. It could be argued that any isolate probabilities above 20% could be used. In a recent source tracking review from Dr. Joan Rose's laboratory at the University of South Florida (Scott et al. 2002), the authors examined the existing literature on all methods and concluded that any isolate probabilities above 50% should be useful. If the isolates form the Coan and Little Wicomico rivers were evaluated at the 50% level (instead of 80%), most of the isolates would be removed from the unknown category and the results would appear very much like those submitted in the final report.

#### References

- Samadpour, M. and Chechowitz, N. (1995) Little Soos Creek Microbial Source Tracking: a Survey. *University of Washington Department of Environmental Health*, Seattle, WA. Scott, T. M., J. B. Rose, T. M. Jenkins, S. R. Farrah, and J. Lukasik. (2002) Microbial Source
- Tracking: Current Methodology and Future Directions. *Applied and Environmental Microbiology* 68:5796-5803.
- Simmons, G. M., Jr., Waye, D.F., and Herbein, S.A. (2002) Estimating Nonpoint Source Fecal Coliform Sources Using DNA Profile Analysis, *Advance in Water Monitoring Research*, pg. 143-167

# **Appendix C**

# List of Attendees and Questions asked at the Public Meeting of June 22, 2003

# List of Attendees for the Coan and Little Wicomico River TMDL Public Meeting Held on July 22, 2003 at the Northumberland County Courthouse Complex

Name	Organization
Mark Alling	Va. Department of Environmental
	Quality
Chester C. Bigelow, III	Va. Department of Environmental
	Quality
<b>Charles Martin</b>	Va. Department of Environmental
	Quality
Denise Moyer	Va. Department of Environmental
	Quality
Hoyt Wheeland	Va. Department of Conservation and
	recreation
Mike Harwood	NAPS
Lynton land	NAPS
Rosalie Coultrip	Va. Department of Health
Richard Cox	Three Rivers Health District
Rueben Varghese	Three Rivers Health District
Susan Lindsey	NAPS
Alfred C. Fischer	Northumberland County Planning
	Commission
Mary P. Cockrell	Landowner
Hugh Markham	Tidewater Resource Conservation
	District, USDA
Richard F. Haynie	Norhumberland County Supervisor
Stuart McKenzie	Northern Neck Planning District
	Commission
Thomas H. Tomlin	Norhumberland County Supervisor
E. luttrell Tadlock	Northumberland County government
W. H. Shirely	Northumberland County government

#### **Questions asked at the Public hearing**

- Q1. Could you describe the BST water quality study? Was this something that EPA has bought into?
- A: a) The BST study collects water quality samples for bacteria analysis. Using resistance to antibiotics as an indicator, the test helps us decide which animal the bacteria may be coming from. the theory is that because humans, their pets and livestock receive more antibiotics than natural populations we can distinquish their bacterial signature from these natural populations and from each other. It is an estimate of the relative contribution to the bacteria loading from humans, pets, livestock, wildlife and birds.

  b) The Environmental protection agency is fully supportive of the ARA methodology to determine bacterial sources. Research does continue in to this and other tools.
- Q.2 Is there a companion DNA based study to the BST anlysis? Are publications available?
- A: Studies have been done doing DNA analysis. However it is impracticle to do them every time the ARA method is used. We have included the researchers BST studies with this report. A detailed reference list is included with each.
- Q.3. Does the ARA account for geographic variations?
- A: As part of each ARA based BST study, a library of scat bacteria samples is assembled to ensure that geographic variences are addressed.
- Q.4. Is the library DNA analysis based or just ARA?
- A: DNA analysis is incorporated into the library.
- Q.5. Are you confident that the positioning of stations is not targeting human influence?
- A: VDH has selected these station locations to accurately characterize the entire system. While human based sources of bacteria are a serious concern, it is all forms of bacteria at which the standard is focused. The is no intentional human bias though bacteria of human origin is a serious concern.
- Q.6. Does the timeframe of sampling have an effect? What is the time frame, especially in light of spring rains?
- A: Sampling is conducted once per month for a given year. Because we do not sample every day it takes several years of data to determine any seasonal effect.

  Weather conditions which precede sampling events are recorded to help us with precipitation effects.
- Q.7. VDH has worked on previous problems regarding failing septic systems. Why don't we just stick with what they are currently doing?

#### **Questions asked at the Public hearing (continued)**

- A: There is no intent to surplant the existing VDH program. Rather we hope to focus additional resource toward resolving these problems.
- Q.8. Have you coordinated sampling events with biosolids applications?
- A: We have not specifically done so in several years. However the Piedmont Regional office of DEQ will work with the County and concerned citizens to address this concern.
- Q.9. What is the consequence if we still don't meet the standard after the TMDL and Implementation Plan are enacted?
- A: The process has been staged to allow assessment of the effectiveness of implementation measures. Implementation is largely voluntary in non-point source dominated systems. Only areas which have permitted discharges would see immediate changes in the form of the TMDL load being made part of their permit.
- Q.10. What about other pollutants in the future?
- A: Should other pollutants result in violations of water quality standards sufficient to place the water body on the 303 (d) list then a TMDL would be required for that pollutant.
- Q.11. Is the idea to use the least most costly BMP or identify the problem first?
- A: The first step is to identify the problem and the target level to be met. BMP selection is done as the implementation plan is developed. Such a plan may be staged incorporating refined problem definition and applying less costly but focused BMP's and only using more costly solutions if the levels can be met no other way.
- Q.12. Does the efect of water movement have an affect on the source ID?
- A: The method selected for this water body treats all of the water as one block. It does not look at circulation or distribution and movement within the system. As we are using a watershed approach and attempting too address the entire surrounding areas problems as a solution to the in stream problem. This ensures that all areas receive equal attention and that the best solution to meeting the water quality standard is promoted.
- Q.13. Who will do the implementation? Is the state providing funding? the localities? is this an unfunded mandate?
- A: The implementation, like the TMDL development is considered to be a partnership between all of the stakeholders. These are the state, local government and citizens. As much of what needs to be accomplished is in the purview of the local health department etc... Some of the burden would fall to the local government though state agencies will

#### **Questions asked at the Public hearing (continued)**

- do everything to provide assistance. At present there is very little additional funding for implementationn.
- Q.14. What is the best estimate of the timeframe for this TMDL?
- A: We anticipate that both the Coan and Little Wicomico River TMDL will be finalized by January of 2004.
- Q.15. With the magnitude of the human source you found how many cranked tanks would this suggest?
- A: That is difficult to say. VDH does surveys annually. A copy of the most recent one is included in the report,
- Q.16. How many other shellfish TMDL's are you doing other than the Coan and Little Wicomico?
- A: These two reports represent 9 TMDL's, there are an additional 19 or so in Northumberland County. There are more than 230 statewide.
- Q.17. Do you see implementation within 5 years?
- A: Implementation as soon as feasible is always desirable. It is however difficult to determine when implementation would actually begin. The plan can begin anytime after the TMDL is approved.
- Q.18. When you see a large spike in the data does DEQ investigate?
- A: The health Department takes the sample. By the time we know there is a spike several days or weeks have passed. Unless there is an accompanying fish kill or similar incident we would not know about it until much later. A persistent pattern of violations would be investigated.
- Q.19. Why not look at the entire watersheds within the county? Can this report be expanded to include all of those in the county?
- A: Part of what is driving this TMDL effort is a court order to address the impaired waters in Virginia and other states. Therefore those segments affected by the order must have priority. Also a report on the entire county wold be very difficult to complete in the timeframe we have available to us.
- Q.20. If the standard was changed from shellfish to swimming how many areas would still be listed?

# **Questions asked at the Public hearing (continued)**

- A: Many areas would no longer require TMDL's, others would remain on the list. We do not have an exact number.
- Q.21. Is there going to be an implementation fund?
- A: There are currently no state funds specific to implementation.